



FINTON HOUSE  
SCHOOL

## CHILD PROTECTION/SAFEGUARDING POLICY

Member(s) of staff responsible: Catherine Hitchcock

Date Revised: February 2023

Governing committee/sub-committee responsible: Safeguarding

Signature: Liz Buckley, Chair of Governors

Signature: Ben Freeman, Headmaster

Date: February 2023 signed off by Chair and Safeguarding governor and subject to full ratification at Autumn Board of Governors.

*FOR AN ADDENDUM TO THIS POLICY DURING COVID-19 SCHOOL CLOSURE PLEASE CONTACT THE SCHOOL OFFICE*

A copy of this policy is available to all governors and parents via the School website or a hardcopy on request from the School Office. It is accessible to all staff electronically (in the Policy folder on the Staff Admin Drive) and a hardcopy held on file in the Head's Office. This policy applies to all at the School including those in Reception (the EYFS).

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## 1. Introduction

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The Governors and staff of Finton House School fully recognise the responsibilities and duty placed upon them to have arrangements to safeguard and promote the welfare of all pupils at the School. Staff are able to identify concerns early, provide help for children and prevent concerns from escalating. Staff act immediately rather than wait to be told. Everyone who comes into contact with children and their families has a role to play.

Safeguarding and promoting the welfare of children (includes everyone under the age of 18) is defined as *'protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.'* (KCSiE 2022).

Where a child is suffering significant harm, or is likely to do so, action is taken to protect the child. A referral will be made to Children's Social Care (and if appropriate the police) immediately. Action is also taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

If a child is suffering or likely to suffer significant harm, the local authority, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect a child is suffering, or is likely to suffer, significant harm. Action must be taken to *'safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called 'honour based' violence, and extra-familial threats like radicalisation and sexual exploitation'*. (KCSiE 2022)

A child in need is defined under the Children Act 1989 *'as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.'* (KCSiE 2022)

The School provides a caring, positive, safe and stimulating environment in which pupils can learn and which promotes the social, physical and emotional wellbeing of each individual pupil. All staff (please note in this policy that 'Staff' refers to all adults working with children, including volunteers and peripatetic teachers) recognise, including Governors, that it is their responsibility to help safeguard children and to adopt a child-centred approach. Thus to consider, at all times, what is in the best interests of the child and to play a role in identifying concerns, sharing information and taking prompt action. Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. All staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, which can be signs that children are at risk. See Appendix 3 for possible safeguarding issues all staff must be aware of. Staff are also aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments.

If staff have a concern they speak to the designated safeguarding lead (DSL) or deputy. The DSL will then consider the following options.

- Managing any support for the child internally via the School's own pastoral support processes.
- An Early Help Assessment
- Or a referral for statutory services through Wandsworth Multi-Agency Safeguarding Hub, MASH.

For additional information to this policy please see the following documents (*plus Appendix 6*):

- Keeping Children Safe in Education: statutory guidance for schools and colleges and including in particular Part One & Annex A: Information for all school and college staff (2022 HM Government)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1080047/KCSIE\\_2022\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf)
- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (HM Government)  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Revised Prevent Duty Guidance: for England & Wales (HM Government)  
<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>
- The use of social media for online radicalisation (HM Government)  
<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>
- What to do if you're worried a child is being abused (HM Government)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
- Disqualification under the Childcare Act 2006 (HM Government)  
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>
- London Child Protection Procedures - 7th edition (London Safeguarding Children Partnership)  
<https://www.londoncp.co.uk/>
- NPCC (National Police Chief's Council) Guidance on for schools and colleges – When to call the police  
<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

Please note that due to the regulations and restrictions related to the COVID-19 pandemic there is an addendum to the Child Protection and Safeguarding policy and one to the First Aid and Medication policy. These addendums are continuously being updated to reflect the latest Government Guidance and information received from Wandsworth Safeguarding Children partnership. See also: Guidance for *Schools: coronavirus (COVID-19)*  
<https://www.gov.uk/government/collections/guidance-for-schools-coronavirus-covid-19>

and-  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1002322/Schools\\_guidance\\_Step\\_4\\_update\\_for\\_14\\_July.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002322/Schools_guidance_Step_4_update_for_14_July.pdf)

The Designated Safeguarding Lead (DSL), member of staff with responsibility for child protection and the Deputy DSLs together with the Head are the most likely to have a complete safeguarding picture and to be the most appropriate person(s) to provide advice on the response to safeguarding and child protection concerns. In the absence of the DSL, the Head, Ben Freeman will cover the DSL role. There is a Governor with responsibility for Child Protection & Safeguarding and Prevent, who has DSL experience and reports termly to the Board of Governors having met with the DSL. The DSL has responsibility for online safety and is supported by the Assistant Head Technology, IT Technician and IT Governor.

#### Contact Details:

DSL, Prevent Lead & Designated Teacher for Looked After Children	Catherine Hitchcock	<a href="mailto:catherine.hitchcock@fintonhouse.org.uk">catherine.hitchcock@fintonhouse.org.uk</a>	020 8682 0921  07931 995 964
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Head	Ben Freeman	<a href="mailto:ben.freeman@fintonhouse.org.uk">ben.freeman@fintonhouse.org.uk</a> (Covers DSL when DSL is not available)	020 8682 0921
Deputy DSL	Susan Dalton	<a href="mailto:susan.dalton@fintonhouse.org.uk">susan.dalton@fintonhouse.org.uk</a>	020 8682 0921
Deputy DSL EYFS	Lucy Alsford	<a href="mailto:lucy.alsford@fintonhouse.org.uk">lucy.alsford@fintonhouse.org.uk</a>	020 8682 0921
Online Safety Assistant Head Technology	Andy Dyer	<a href="mailto:andrew.dyer@fintonhouse.org.uk">andrew.dyer@fintonhouse.org.uk</a>	020 8682 0921
Safeguarding Governor	Nathalie Hart	<a href="mailto:Nathalie.hart@fintonhouse.org.uk">Nathalie.hart@fintonhouse.org.uk</a>	020 8682 0921

#### Training Qualifications of key Staff:

Head	Safeguarding for DSL Level 3 Prevent	September 2022 March 2022
DSL	Level 3 Child Protection & Safeguarding Prevent	Sept 2021 Feb 2021
Deputy DSL	Level 3 Child Protection & Safeguarding Prevent	September 2022 Feb 2020
Deputy DSL EYFS	Level 3 Child Protection & Safeguarding Prevent Level 3 Safeguarding EYFS Refresher	Nov 2021 August 2020 Jan 2022
Deputy DSL Online Safety	Advanced Certificate in Online Safety for ICT Leads	Sept 2022
Chair of Governors	Level 3 Child Protection & Safeguarding	April 2022
Safeguarding Governor	Level 3 Child Protection & Safeguarding	June 2021

We work with Wandsworth Safeguarding Children Partnership and the three safeguarding partners are the (Local Authority (LA), Clinical Commissioning group (CCG) and the chief of officer of police for the local area). Schools are one of the 'relevant agencies'. We have a statutory duty to co-operate and act in accordance with the published local arrangements. The School

recognises its responsibilities and duties to report Child Protection concerns to Children's Social Care within Wandsworth Safeguarding Children Partnership and pays due regard to their guidance. The School assists Children's Social Care in Child Protection enquiries and in supporting 'Children in Need'. In the event of the death of a pupil, the School would follow the Wandsworth Child Death Review process. If the family is resident in another Borough we would follow their LA procedures.

All parents are informed of the School's child protection and safeguarding policy and it is available on the School's website. If parents have any concerns, they should contact the DSL, Ben Freeman (Head). The DSL will raise child protection/safeguarding concerns with parents at the earliest appropriate opportunity.

The children are aware they can discuss concerns with any member of staff. On the School's virtual learning site, Frog there is a pastoral page in which the children can send a message to the Pastoral Team and they will respond within 24 hours during a school week. There are posters around school and a child friendly safeguarding display board that remind children who they can talk to with any worries. There is also a link to Childline on Frog. We recognise that matters related to child protection and safeguarding are of a confidential nature. The Head or DSL will therefore share detailed information about a child with other staff members on a need to know basis only.

The School ensures that all staff and Governors receive appropriate safeguarding and child protection training (including online safety). Staff and Governors with contact with children are required to read and understand the policy together with Part One & Annex A of 'KCSiE' Sept 2021 and to be aware of their role. Those staff who do not work directly with children read either Part One or Annex A (a condensed version of Part One). They are made aware of the policies and procedures, which support safeguarding during their induction with the Deputy Head (DSL), and these include:

- The Pastoral Care policy
- Anti-bullying policy
- Missing Child policy together with safeguarding response to children who go missing from education included in this policy.
- Health and Safety policy
- Positive Handling & Physical Intervention policy
- Staff Behaviours (*See Employment Handbook*)
- Staff Handbook (Section B: About the School day)
- Technology policy including Online Safety
- Staff low level concerns policy
- Whistleblowing
- The role of the DSL, which includes the identity of the DSL and the deputy DSLs.
- The referral process and Wandsworth supports systems i.e. MASH and Early Help.
- The statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or is likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All new staff are made aware that if they have any concerns they should act upon them immediately and speak to the DSL (or deputy). They are advised what to do if a child tells them he/she is being abused or neglected and how to manage the requirement to maintain an appropriate level of confidentiality. They are informed that they have a professional responsibility to share information with the DSL and with relevant agencies where necessary to safeguard and promote the welfare of children.

## 2. Aims

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- To raise awareness of all Staff (all adults working with children, including volunteers and peripatetic teachers) of the need to safeguard all children and of their

responsibilities in identifying and reporting possible cases of abuse or any safeguarding concerns.

- To emphasise the need for good communication between all members of staff in matters relating to child protection and safeguarding.
- To develop a structured procedure within the School, which is followed by all members of the School community in cases of suspected abuse.
- To provide a systematic means of monitoring pupils known or thought to be at risk of significant harm or where there are ongoing concerns.
- To work openly and in partnership with parents in relation to child protection/safeguarding concerns and to provide advice and connections to other professionals/agencies that can offer support, whilst acting in the best interests of the child at all times.
- To support all pupils' development in ways that will foster security, confidence and independence.
- To promote safe practice and challenge poor and unsafe practice.
- To develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of children.
- To ensure that all staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- To ensure that all vulnerable children, including those who need a social worker and those requiring mental health support are provided with appropriate help in school to ensure their needs are identified and responded to effectively.
- To ensure that all adults working within our school have been checked as to their suitability to work with children, in line with current guidance.
- To integrate opportunities into the curriculum to teach safeguarding and for children to develop the skills they need to recognise and stay safe from abuse, allowing for continuity and progression through the key stages.
- To take account of and inform policy in related areas, such as anti-bullying, online safety, discipline and behavior, pastoral care, health and safety, missing children, child sexual exploitation, FGM, 'Honour Based' violence, serious youth violence, including knife crime, anti-raidicalisation, positive handling and physical intervention procedures, procedures for dealing with allegations against staff and recruitment practice.
- To comply with the core responsibilities expected of the School as a relevant agency to the multi-agency safeguarding arrangements in Wandsworth, as set out in the Wandsworth Safeguarding Children Partnership published arrangements.

### 3. Key Principles

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We believe that every child has the right to be treated as an individual, to have his or her needs met, and to be shown respect for all aspects of his or her identity, including gender, nationality, ethnic origin, religion, sexuality and culture. The ethos of the School supports open practice, good communication and a safe culture in which children can thrive and learn.

- We recognise that abuse and neglect are complex issues and rarely standalone events and therefore require a culture of vigilance, professional curiosity, respectful challenge and effective recording and monitoring systems.
- We recognise that abuse occurs in all cultures, religions and social classes and that staff need to be sensitive to the many differing factors, which need to be taken into account depending on the child's cultural and social background when dealing with child protection and safeguarding issues. However, we also recognise that the needs of the



child are paramount and any concerns will be referred on appropriately whatever the family background of the child concerned.

- We are sensitive to the fact that parenting and childrearing styles can vary according to class, age, race, ethnicity, culture and /or religion. We recognise that all parents have the right to raise their children according to their family traditions and we are aware of passing judgement on or discriminating because of difference. We work in partnership with parents and at all times our prime concern is the welfare and safety of the child. Where there is conflict between the needs of the child and the parent, the interests of the child will be paramount.
- We are aware that the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to us sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- We recognise that because of the day-to-day contact with children school staff are extremely well placed to observe outward signs of abuse. It is likely that there may be children at Finton House who are being abused, physically, emotionally or sexually.
- All staff have a responsibility to identify and report suspected abuse (including suspected, actual or reported abuse by other members of staff) and to ensure the safety and wellbeing of the pupils at Finton House.
- Staff are aware of the signs of the various types of child abuse and the procedures they should follow if they have concerns about a pupil. They also know of the damage that bullying can inflict upon a pupil, causing considerable distress to the extent that it can affect their health and development. In the first instance, cases are dealt with under the Anti-Bullying Policy (see policy for details).
- We acknowledge that (although all designated/key staff have the skills and experience to respond to a variety of situations and issues) there may be occasions where it will be appropriate to consider whether specific or additional arrangements need to be put in place where an issue is particularly sensitive due to gender issues or cultural or faith issues. This ensures that in cases of sexual abuse in particular, the same sex member of staff can speak to a pupil.
- All staff should feel able to raise concerns about poor or unsafe practice and know that these concerns will be taken seriously by the Senior Leadership team and dealt with sensitively and appropriately.
- We recognise that a child who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth, they may feel hopeless and humiliated and may feel self-blame.
- We recognise that the School may provide the only stability in the lives of pupils who have been abused or are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived as normal to that which is overly aggressive, disturbed or withdrawn.
- We know that it is important that pupils feel secure, are encouraged to talk and are sensitively listened to, and that pupils know that there are adults in school whom they can approach if they are worried or unhappy.

#### 4. Responsibilities for Governing Body

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- The Governors will ensure that they comply with their duties under legislation and follow the Charity Commission guidance on safeguarding children - <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>  
They will ensure that the policies and Employment Handbook (e.g. Child Protection & Safeguarding, Staff Behaviours (section in Employment Handbook), Whistleblowing, Positive Handling & Physical Intervention, Anti-bullying, Supervision of Pupils, Acceptable use of Digital Resources, Technology & Online Safety, First Aid & Medication and Health & Safety), procedures and training are effective and comply with the law at all times and take into account the procedure and practice of the



Wandsworth Safeguarding Children Partnership, Independent School Standards Regulations, ISI (Independent School Inspection) regulations and KCSiE 2022.

- They ensure that the School contributes to the multi-agency working with Wandsworth through the effective implementation of the Child Protection policy and procedures and effective communication and good cooperation with the three safeguarding partners and local agencies through the regular attendance at meetings etc. (*See for multi-agency working statutory guidance 'Working Together to Safeguard Children'*)
- The Governors recognise that all children should be protected but that some groups of children are potentially at greater risk of harm and thus ensure this is reflected in the School's policy and procedures.
- The Governors will prevent people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- The Governing body ensures that all staff undergo safeguarding and child protection training (including online safety) at induction and receive regular refresher training, at appropriate intervals, as and when required, to keep up with any relevant safeguarding and child protection developments.
- The Governing body should ensure that all governors receive appropriate safeguarding and child protection (including online safety) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- The Governing body is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.
- Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Governing Body do all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, the Governing Body ensure Finton House has appropriate filters and monitoring systems in place and oversee regular reviews of their effectiveness. The Safeguarding Governor has a termly update on Smoothwall alerts and investigations from the DSL. They ensure that the Head, DSL and IT Manager staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- They feel confident that systems are in place that will identify children accessing or trying to access harmful and inappropriate content online. At the same time, they are aware that 'over blocking' can lead to unreasonable restrictions as to what children can be taught concerning online teaching and safeguarding.
- The Governors have due regard to the need to prevent people from being drawn into terrorism in accordance with the Counter-Terrorism and Security Act 2015. They ensure that reasonable checks are carried out with regard to extremism, on all visitors who are attending the School to work with staff and children e.g. speakers in assemblies and workshops.
- The Governors put in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in the future.
- The Governors ensure that the School has clear policy and procedures to minimise the risk of child on child abuse, to deal with any allegations and to support victims, perpetrator(s) and any other child affected by child on child abuse.
- The governing body ensures together with school leaders that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Also that systems in place are easily understood and accessible for children to confidently report abuse, knowing their concerns will be treated seriously and they can safely express their views and give feedback.

- The School's child protection and safeguarding policy is reviewed annually by the Board and when approved signed off by the Chair of Governors and Head. It is also available on the School's website.
- The Governors will ensure that they are aware how children are taught about safeguarding, including online safety, through the curriculum, assemblies and RSE and PSHEE. That they are also aware of school practices to help children to adjust to their behaviours in order to reduce risks, including the safe use of electronic equipment and access to the internet.
- The Governors ensure there is an appropriate senior member of staff from the leadership team who is appointed to the role of Designated Safeguarding Lead. They make sure they have sufficient time, funding, supervision and support to fulfil child welfare and safeguarding responsibilities effectively.
- The Governors ensure that there is a member of the Governing Body who has responsibility for safeguarding/child protection and will liaise with the Local Authority on issues of child protection and in the event of an allegation of abuse being made against the Head. They also meet termly with the DSL and a detailed written report is discussed at the Safeguarding and Wellbeing Committee meeting prior to the Board meeting each term. The designated governor checks each term whether the policy in practice is being followed by questioning individual staff during their visits.
- The Governors are aware and make sure relevant staff have due regard of the processing conditions under the Data Protection Act 2018 and GDPR which includes the storage and sharing of information for safeguarding purposes including 'special category data' that allows practitioners to share information e.g. without consent, if not sharing it would place a child at risk or not providing pupil personal data when the serious harm test under legislation is met.
- The Governors will remedy any deficiencies or weaknesses concerning child protection arrangements that are brought to its attention immediately.

## 5. Responsibility of Designated Safeguarding Lead (DSL) and Deputies

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The DSL is the Deputy Head and she leads the responsibility for safeguarding and child protection. The DSL and deputies liaise with the three safeguarding partners and work with other agencies in line with '*Working Together to Safeguard Children*'. When necessary they will involve the police

- NSPCC - When to call the police -  
<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

The DSL has the following responsibilities (see also Deputy Head Job description):

- During term time the DSL (or a deputy) will always be available (during school hours) for staff to discuss any safeguarding concerns. The DSL or the Head are either available out of hours/out of term activities. In exceptional circumstances they will be available via phone or Zoom video conferencing.
- To attend relevant training and ensure that staff are aware of issues such as child sexual exploitation, female genital mutilation, county lines, upskirting, 'honour based' abuse etc., and that staff understand the indicators and recognise the complexities of these issues for children.
- To ensure that they, Deputy DSLs and all have up to date formal and informal child protection and safeguarding training (including online safety) at the appropriate level.
- To ensure all staff, governors, volunteers (in regulated activity) are supplied with a copy of Part One and Annex A of 'KCSiE' 2022 guidance and have signed to say that they have read and understood this document. Those staff who do not work directly with children read either Part One or Annex A (a condensed version of Part One).
- To have understanding of the assessment process for providing Early Help and intervention and of how Wandsworth local authority conducts a child protection

conference, a child protection review conference or death review and be able to attend and contribute to these effectively when required to do so.

- To ensure they have the skills, knowledge and understanding necessary to keep safe children who are looked after by the local authority.
- To liaise with staff (especially pastoral staff, IT Technician & SENCo) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies and to act as a source of support, and advice and expertise for all staff. In addition, to support any staff who make referrals to Children's Social Care via MASH (Multi-Agency Safeguarding Hub) or to the Channel / PMAP programme (part of the prevent strategy).
- To recognise the additional risks that children with SEN and disabilities face online, for example, from online bullying, grooming and radicalization and to be confident in supporting SEND children to stay safe online.
- To understand and support the School with regards to the requirements of the Prevent duty and to provide advice and support to staff on protecting children from the risk of radicalisation. To ensure that the radicalisation of visitors assessment list is updated weekly.
- Referring any concerns with regard to suspected abuse or radicalisation to the Head and where appropriate to Children's Social Care (MASH) and adult concerns over radicalisation/extremism to the Wandsworth Channel panel.
- Keeping all staff updated with current procedures, ensuring that new and temporary staff, volunteers, teacher trainees and work experience students are all familiar with child protection responsibilities.
- The DSL is responsible for online safety and understands the unique risks associated with online safety and is confident that the School has the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- To monitor Smoothwall alerts and to investigate and to record action from 'danger alerts' for both children and staff.
- To update the Staff, Parent and Governor Child Protection and Safeguarding portals on Frog.
- Support the Head in dealing with low level concerns and making contact with the LADO in relation to allegations against someone working in the School and/or with police if a criminal offence is suspected.
- To refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service and where a crime may have been committed to the police as required.
- Keeping detailed, accurate and secure written records of concerns and referrals on CPOMS.
- Monitoring school attendance and keeping the Head informed. Where necessary a meeting with the parents may be held to discuss the matter.
- To be aware of the specific needs of children in need, those with special educational needs and young carers.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
- To ensure that all-relevant information about a child is disseminated to appropriate staff within the School, bearing in mind confidentiality restrictions.
- To ensure all parent readers and club peripatetic leaders have completed the online Educare modules on child protection & safeguarding and radicalisation, if they do not have a current valid training certificate (within the last 3 years). The DSL will meet with all new parent readers and any peripatetic club leader for a safeguarding briefing.
- Checking the lists termly for all child protection/safeguarding children being taught by a particular peripatetic, club, music, therapist or learning support teacher so they can be briefed where appropriate on any child protection/safeguarding issues relating to children they teach.
- Along with the Deputy DSLs to understand the relevant data protection legislation and regulations (especially the DPA 2018 and GDPR), together with the importance of information sharing e.g. within the School, other agencies, practitioners.

- When a child leaves the School ensuring that contact is made with the DSL of the new school and the completed child protection records are transferred securely to the new school. These are sent recorded delivery to the DSL of the new school, and separate from the main pupil file and confirmation that they have arrived is required. The child's local authority Education Welfare Service and Children's Social Care are informed that the child is no longer on roll. (See *Registration policy*)
- To attend termly twilight training meetings of Wandsworth Safeguarding Children Schools Partnership, to discuss child protection and safeguarding matters with colleagues and to receive training.
- To administer a Safeguarding Audit and to analyse results and to be shared with the Board of Governors.
- To ensure there is an annual review of the School's policy and the procedures and implementations are updated and reviewed regularly in liaison with the governing body. In addition, making sure it is up to date on the School website and relevant Frog portals. Plus all stakeholders are aware of the changes.
- To liaise with the Head to inform him of issues especially ongoing enquires under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to be accompanied by an Appropriate Adult. Further information can be found in the Statutory guidance – PACE Code C 2019. As well as updating the Head weekly on safeguarding issues and changes.
- Chair DSL, Deputy DSLs and Head termly meeting to discuss child concerns and updates.
- To meet weekly with the Head, Deputy DSLs (and IT Manager when appropriate) to discuss any online safety issues, new guidance, training, staff, pupils or visitors etc. As well as radicalisation risk assessment sheet for visitors and other issues/children.
- Meeting termly with the Child Protection Governor to discuss individual cases and to review policy. A report is given to the Board on the efficiency with which CP duties have been discharged. In addition, arrange a time each term for the Child Protection Governor to visit the School during the working day to talk to a number of staff to check their understanding of child protection/safeguarding matters.
- To produce a written report on Child Protection and Safeguarding each term to be discussed at the governors Safeguarding and Wellbeing sub-committee meeting prior to the termly Board meeting.
- To provide the Board with a copy of the revised policy to be signed off by the Chair of Governors at the Autumn Term Board meeting.

The Head will deputise for the DSL in their absence.

Deputy DSL's (DDSL) duties and responsibilities are (see also *Job Descriptions and Responsibilities* document):

- To be available for staff to discuss safeguarding and child protection concerns.
- To ensure all safeguarding discussions including those with pupils are recorded as soon as possible.
- To assist with the monitoring and updating the Child Protection and Safeguarding concern lists and completing the monitoring record sheet.
- To support the DSL in disseminating relevant information about pupils of concern, bearing in mind confidential restrictions and that sharing information should not stand in the way of the need to promote the welfare and protect the safety of children.
- To understand the Early Help Assessment and MASH referral systems within Wandsworth and when the DSL is not in school, support staff with any disclosure made and assist the Head in making referrals to Children's Services.
- To assist with or to deliver staff training.
- To understand and support the DSL with the requirements for the Prevent Duty and provide advice and support to staff on protecting pupils from the risk of radicalisation.

- Going through the learning support, club and music lists termly to identify Child protection children being taught by particular peripatetic, club, music, therapist or learning support teacher so they can be briefed by the DSL.
- Checking the radicalisation risk assessment of visitors to the School produced by the Office each week.
- To assist the DSL in updating the Staff and Governor Child Protection and Safeguarding portals on Frog.
- To meet weekly with the DSL
- To attend twilight training meetings of Wandsworth Safeguarding Children Schools Partnership, to discuss child protection and safeguarding matters with colleagues and to receive training.
- To attend the governors Safeguarding and Wellbeing sub-committee meeting prior to the termly Board meeting each term.

The Deputy DSL (DDSL) for EYFS duties and responsibilities are:

- To be available for EYFS staff to discuss safeguarding and child protection concerns.
- To ensure all safeguarding discussions including those with pupils are recorded as soon as possible.
- To assist with the monitoring and updating the Child Protection and Safeguarding concern lists and completing the monitoring record sheet.
- To support the DSL in disseminating relevant information about EYFS pupils of concern, bearing in mind confidential restrictions and that sharing information should not stand in the way of the need to promote the welfare and protect the safety of children.
- To ensure that the correct procedure is followed for any toileting issues with children in EYFS and where appropriate anywhere else in the School.
- To understand the Early Help Assessment and MASH referral systems within Wandsworth and when the DSL is not in school, support staff with any disclosure made and assist the Head in making referrals to Children's Services.
- To assist with or to deliver staff training.
- To understand and support the DSL with the requirements for the Prevent Duty and provide advice and support to staff on protecting pupils from the risk of radicalisation.
- Going through the learning support, club and music lists termly to identify EYFS Child protection children being taught by particular peripatetic, club, music, therapist or learning support teacher so they can be briefed by the DSL.
- To assist the DSL in updating the Staff and Governor Child Protection and Safeguarding portals on Frog.
- To meet weekly with the DSL
- To attend twice termly twilight training meetings of Wandsworth Safeguarding Children Schools Partnership, to discuss child protection and safeguarding matters with colleagues and to receive training.
- To attend the governors Safeguarding and Wellbeing sub-committee meeting prior to the termly Board meeting each term.

Assistant Head Technology has specific responsibility for online safety:

- Assisting with or the delivery of online safety staff training.
- To assist the DSL in ensuring that there is online safety training for parents and children and staff (along with regular updates as necessary or appropriate).
- Along with the IT Technician to keep the DSL/Head briefed with any new risks associated with online safety and to be confident that the School has the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- To keep up to date with all new online safety changes and to ensure that the DSL/Head are aware.



- To attend the governors Safeguarding and Wellbeing sub-committee meeting prior to the termly Board meeting each term.
- To attend any relevant Wandsworth online safety meetings and training.

## 6. Recognition of Child Protection/Safeguarding Issues in Specific Circumstances

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For definitions and recognising abuse, please see *Appendix 2* and for safeguarding issues see *Appendix 3*. All staff have an awareness of safeguarding issues through regular training. Staff are aware that behaviours such as drug taking, alcohol abuse, truanting, and sexting can put children in danger. Staff also know that safeguarding issues can manifest themselves via child on child abuse (*please see section 'Children who Abuse other Children including Sexual Violence and Sexual Harassment'*). This is most likely to include bullying (including cyberbullying, gender based violence/sexual assaults and sexting). These concerns would be raised with both the Pastoral Team and the DSL. For radicalisation, please see '*Radicalisation (Prevent)*' section in this policy.

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families and school. These extra-familial threats might arise at school, from within peer groups, or more widely from within wider community and/or online. These threats can take a variety of different forms within the wider community and/or online and between children outside school. Children can be vulnerable to multiple threats, including exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Children can be vulnerable to sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse).

All staff and the DSL (or Deputies) consider the context within which such an incidents and/or behaviours occur. Any risk assessments of children would consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. They would consider the individual needs and vulnerabilities of each pupil and the parental capacity to support the pupil, including helping the parents and carers to understand any risks and to support them to keep children safe and assess potential risk to the child. Interventions would focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to social care. Where a child is of significant risk or is suffering harm the information will be shared as part of the referral process to children's Social Care by the DSL. (See Section, 'School procedure for Suspected Child Abuse'.)

## 7. Guidance for Staff in Dealing with a Disclosure

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(See Information sharing; *Advice for practitioners providing safeguarding services to children, young people, parents and carers* - DfE)

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

### FROM A CHILD

Staff are in a unique position to talk to the child, to help and to provide a safe haven. They are encouraged to take the issue of abuse seriously and are aware that they should not assume a colleague or another professional would take action and share information that might be critical in keeping children safe. They have a professional responsibility to share information with other relevant agencies where necessary to safeguard and promote the welfare of children immediately. (See 'Data Protection and Information Sharing' under Related Policies section.) Staff are reminded

not to try to handle issues on their own. They should report them to the DSL or Deputy DSLs immediately. Staff know that they will be helped to deal with their own feelings and anxieties.

### Advice on how to react when a Child wants to talk about Abuse

If a child chooses to confide in someone, it is important that the member of staff reassures them and that they will be taken seriously, what she/he is saying, even if you are finding it difficult to believe.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

#### General Points:

- Listen carefully to the child, being non-judgmental, clear about boundaries, advising them what will happen next and how they will be involved.
- Respect and accept what the child says. Never push for information and ask leading questions.
- Do not probe but allow the children to tell you in their own words.
- Keep calm
- Look the child in the eye
- Be supportive
- Never promise to keep something a secret. Tell the child sensitively that you will have to disclose the information to people who can help. Use phrases like 'some secrets are too big to keep', 'we'll have to get help to stop this happening again', or 'good secrets I can keep but bad secrets I have to pass on'.
- Whatever has happened, the child is not to blame for the abuse.
- Be aware that the child may have been threatened.
- Do not ask specific questions but in the nature of sexual assault ask 'When did it happen?' This is because forensic evidence can be collected within 7 days.

#### Helpful things to say:

- Tell me what has happened?
- I believe you
- I'm glad you've told me
- It's not your fault
- Is there anyone else you would like to talk to about this?

#### Avoid saying:

- Why did you not tell someone before?
- Did they do X to you?
- I can't believe it
- Are you sure this is true?
- Why? How? When? Who? Where?
- "I'm shocked, don't tell anyone else."



## The child's wishes

- Where there is a safeguarding concern and if appropriate the child's wishes and feelings should be taken into account when determining what action is take and what service to provide. The child should be given the opportunity to express their views and to give feedback. Ultimately, all systems and processes would operate with the best interest of the child at heart.

At the conclusion of the talk:

- Reassure the child again that she/he was right to tell you and that you believe the story.
- Let the child know what you are going to do next and that you will let him/her know what happens.
- It is not your job to decide whether abuse has occurred, but you will need to ensure that you pass the information on to the DSL or Deputy DSLs.

Keep a Record

*(See also section on 'Information and Managing the Child Protection & Safeguarding Files.)*

All staff are aware of record keeping requirements and how they are expected to record any concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing.

They make notes as soon as possible, writing down exactly what the child said and when she/he said it. The best practice is to wait until the end of the disclosure and then to immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the disclosure (especially if it is possible for a second member of staff to be present). If making notes during any disclosure, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. The notes should not reflect the personal opinion of the note taker. It is essential that a dated written record be made including date(s) and times of meeting(s). Special provision may need to be put in place to support dialogue with pupils who have communication difficulties and one of the SENCos should be consulted with regard to this.

*All notes must be signed and dated on CPOMS, as well as read on CPOMS by the alerted DSL or Deputy DSLs. Notes from disclosures may become part of a statutory assessment by Children's Social Care and/or part of a criminal investigation.*

For more guidance please see 'Working Together to Safeguard Children' and KCSiE 2022.

## FROM A MEMBER OF THE PUBLIC

If there is telephone call or email etc., from a member of the public regarding an alleged safeguarding incident it will be fully investigated.

For example, a member of public walking their dog on Tooting Common alleges they saw a member of staff pulling a pupils' arm.

A telephone call to the School wherever possible would be referred to the DSL or Head. If they are not around then the person who takes the call needs to ask what, where and who questions to get as much information as possible. The person's contact details, telephone number (& address if possible) should always be taken so they can be contacted further if necessary by the School or by the LADO. Please refer to the section on, 'Allegations made against or Concerns raised in Relation to Staff, Volunteers, Governors, Supply Agency or Contracted Staff'.

## 8. School Procedure for Suspected Child Abuse

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Our school procedures are in line with those agreed by the Wandsworth Safeguarding Children Partnership, the Secretary of State (See Appendix 4 for '*Actions where there are concerns about a child*' & Appendix 6 for *Guidance Documents & Legislation*).

### Suspected child abuse or a child discloses

- A staff member may have a discussion with the child (See Section on '*Guidance for Staff in Dealing with a Disclosure*'). The child is not pressed for information, led, cross-examined, or given false assurances or absolute confidentiality. However, for the sake of the child, each case will be treated with discretion and only the relevant people informed of what has taken place. Where abuse is alleged, the initial response would be limited to listening carefully to what the child says to clarify the concerns and to offer re-assurance about how she/he will be kept safe. Where the issue is of a particular sensitive nature i.e. sexual nature consideration will be given to the specific member of staff designated to deal with this sensitive issue. Wherever possible the wishes or feelings of the child are taken into account when determining what action to take and what support to provide.
- The member of staff will brief the DSL or Deputy DSLs immediately and any referral will be objective and based on evidence. The member of staff may prefer to talk to the DSL or Deputy DSLs before having a discussion with a child, but this may not always be possible e.g. if a child reveals to a member of staff that they are being abused.
- If the DSL or Deputy DSLs feels there is substance in the suspicions, they will discuss the matter with the Head immediately. The member of staff will also be asked to complete an incident form on CPOMS for the child (see Appendix 1).
- The Head uses their discretion, with the help of the DSL to decide whether to do one or more of the following:

In cases of uncertainty, it may be necessary to ask the Class Teacher or another appropriate member of staff, to chat informally with the pupil to establish whether there are grounds for further investigation (in the rare instances where this has not already been done). For younger pupils a puppet or soft toy is a good prop in getting the children to open up e.g. they tell the puppet their concerns. The DSL or Deputy DSLs may conduct this interview.

There will be a distinction made between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. Significant harm can be caused by one traumatic event or a compilation of events that interrupt, change or damage the child's physical or psychological development. It would be necessary to consider the following along with the Wandsworth level of need Thresholds:

- The severity of ill treatment
- The degree and extent of physical harm.
- The duration and frequency of abuse and neglect.
- The extent of pre-meditation.
- The degree of threat and coercion, sadism and bizarre or unusual elements in child sexual abuse.
- If the child has suffered, or is likely to suffer from significant harm, a referral would be made immediately to Children's Social Care (and if appropriate the police).

Our prime concern at all stages will be the interest and safety of the child. Where necessary, the appropriate action will be taken to ensure the safety of the child. The

law empowers anyone who has actual care of a child to do all that is reasonable in the circumstances to safeguard that child's welfare. For example, a teacher should take all reasonable steps to offer a child immediate protection from an aggressive parent.

- We will carry out risk assessments (including considering contexts outside the home) where required and ensure any assessed risk is appropriately managed and key staff have been provided with the relevant information and with strategies to support safety and wellbeing of pupils and staff members. It maybe that the support for the child can be provided internally via the School's pastoral support process. If the information is not shared with Children's Social Care there will be a record made on the notes stating why, and this will be signed and dated.
- Where practicable and appropriate, concerns will be discussed with the child's parents. However, where this is a risk to the life of a child or a likelihood of serious immediate harm, the parents will not be informed. Parents will be asked for explanations of a suspicious injury, behaviour of child or child's allegation. These conversations will be open and honest, and the parents will be provided with reasons for concerns and required to comment on these concerns. If required, agreement will be sought for a referral to Children's Social Care unless this may put the child at further risk. Formal referrals from named professionals cannot be treated as anonymous, so the parent will ultimately become aware of the identity of the referrer. The meeting will be led by the DSL and with either the class teacher or Head present or both.
- If the child is suffering from a serious injury, medical attention would be sought immediately from A & E and Wandsworth Children's Social Care and the duty consultant pediatrician at the hospital must be informed. Except in cases where emergency treatment is needed, Children's Social Care and the police should initiate any medical examinations required as part of a child protection enquiry.

To support us in deciding what the next steps should be we might contact Ameliah Rayn, Education Safeguarding Lead, Wandsworth Town Hall, Wandsworth High Street, London SW18 2PU, direct line: 0208 871 7961, mobile 07929 862210, email: Ameliah.Rayn@richmondandwandsworth.gov.uk. Alternatively, contact the screening team within MASH via the telephone before submitting a formal referral.

## Records

Any concerns/discussion with the child, whether further investigated or not are always recorded on CPOMS with a time/date stamp. In addition, a record is kept of any discussions with parents, information provided to Children's Social Care and decisions taken. A record on CPOMS is made by the DSL as to whether a referral was made to MASH or not and the reasons why.

## Referral to MASH (Multi-Agency Safeguarding Hub)

Any child who is suffering or likely to suffer significant harm (Wandsworth Level 4 Threshold) would be reported to Children's Social Care immediately by the DSL through the MASH, who respond to referrals to Children's Social care in Wandsworth. We would endeavour to complete the electronic MARF (Multi-Agency Referral Form) with the parent/carer and to get their consent. This will then be sent to MASH (using Egress) within a 24-hour timeframe. However, we can proceed without parents' consent. If parents have not been informed, or have withheld their permission, MASH will be advised that we are proceeding without parental agreement. The parent will also be contacted where appropriate and advised that after considering their wishes a referral still has been made.

Referrals to MASH can be made Mon-Fri, 9.00am to 5.00pm.

MARF should be sent via Egress to: [MASH@wandsworth.gov.uk](mailto:MASH@wandsworth.gov.uk)

Phone: 020 8871 6622

Out of hours: 020 8871 6000

See Appendix 4

In most cases, before a referral an EHA (Assessment) would have taken place and a referral have been made to the appropriate specialist service for support within Early Help. A referral to MASH would then be made if these initial attempts to improve the situation have been unsuccessful, accompanied by evidence of the actions taken to date. However, MASH can accept a referral without the EHA having been completed, where it is clear the case already meets the criteria of Level 4 threshold.

On receipt of the contact or referral, Children's Social Care (CSC) will contact us to discuss our concerns and review the information with us. This is part of the initial screening process. Following this CSC will decide if there is an immediate safeguarding concern, which needs to go straight to a strategy discussion with key partners for a possible Section 47 or Section 17 assessment. If instead the child is a 'Child in Need', this will go straight to one of the assessment teams to undertake a Child and Family Assessment. Complex referrals, where more information is needed will be discussed within the MASH and they will then decide what level of intervention is best to help support and safeguard the child. This work will be completed within 1 working day. We would expect to be informed of the decision regarding the next steps within *24 hours* of our referral to CSC.

If the information about the child and family indicates that statutory intervention is not required, CSC will step down or redirect the referral to Early Help Pathway Hub or Universal Services. There could be a direct transfer to the Hospital Social Work Team based at St George's Hospital.

If not happy with the way, the MASH has dealt with a concern the Chair of the Local Safeguarding Partnership can be contacted – [www.wscp.org.uk](http://www.wscp.org.uk). If the child is from another Local Authority similar contact will be made with their representative. Advice can also be sought from NSPCC.

*The DSL will usually decide whether to make a referral to Children's Social Care, but it is important to note that any staff member can refer their concerns to Children's Social Care directly especially if there is a risk of immediate serious harm to a child. However, they should inform the DSL as soon as possible as the DSL might well have additional information. For details of Wandsworth's Inter-Agency Escalation Policy, please see [www.wscp.org.uk](http://www.wscp.org.uk).*

## 9. Early Intervention and Help

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Early help means providing support as soon as a problem emerges, which is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB (Harmful Sexual Behaviour) and may prevent escalation of sexual violence.

Finton House has a culture of openness and staff are very accessible and approachable. There is provision in place for children to feel able to discuss any concerns within a group or 1:1. For example:

- Social Groups & Y5/Y6 Mentoring Groups
- School counsellors
- Listening buddies
- A link on the Frog Pastoral page so that children can send an email to the Pastoral Team, who will then respond as soon as possible.
- Pupils' Council

The Early Help Assessment (EHA) can help us to identify neglect and intervene early. All staff recognise that when a child or family may be experiencing difficulties, support is most effective if it is provided as early as possible. If a member of staff has a concern, they act on it as soon as is practically possible e.g. health, child development, welfare, behaviour, progress in learning or other aspect of their wellbeing. All staff have a role to play in identifying children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point. Staff are particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan).
- Has a mental health concerns.
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from care or home.
- Is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuses, adult mental health problems or domestic abuse.
- Has returned home to their family from care.
- Has a family member in prison, or is affected by parental offending.
- Is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage
- Is at risk of being radicalised or exploited.
- Is a privately fostered child and is persistently absent from school.

In the first instance, staff would discuss Early Help requirements with the DSL or/and SENCo. A risk assessment and management plan is completed which involves identifying emerging problems, sharing information with other staff, parents and professionals to support early identification. The DSL or SENCo may act as lead professional in undertaking an Early Help Assessment (EHA). Alternatively, the DSL may make a referral to MASH immediately if the child is suffering or likely to suffer significant harm (see section on *School's Procedure for Suspected Child Abuse*). The School recognises that children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances such as trauma.

The EHA would be undertaken with the agreement of the child and their parents or carers, involving the child and family as well as practitioners who are working with the family. It would take account of the child's wishes and feelings wherever possible, their age, family circumstances and the wider community context in which they are living. If we were unsure if our concerns reach the threshold for safeguarding or Early Help, we would contact the Front Door on 020 8871 6622.

The EHA form is available at

[https://search3.openobjects.com/mediamanager/wandsworth/fsd/docs/eha\\_nov\\_2019\\_v4\\_0.pdf](https://search3.openobjects.com/mediamanager/wandsworth/fsd/docs/eha_nov_2019_v4_0.pdf).

The completed EHA form is emailed via EHITS (Early Help IT System) to the Early Help Pathway Hub, which is the 'Front Door' for services. [ehits@richmondandwandsworth.gov.uk](mailto:ehits@richmondandwandsworth.gov.uk). Services available can be accessed via THRIVE -

<https://thrive.wandsworth.gov.uk/kb5/wandsworth/fsd/home.page>.

For Early Help Desk Support: Tel: 020 8871 7746/7899 (9.30 to 4.30pm).

Early Help falls within THRIVE in Wandsworth and services are provided within multi-disciplinary area clusters and the School falls in the Tooting cluster. Further advice can be sought from Nicky Nicholls – Head of Tooting Cluster & Geraldine Lorage - Early Help Manager of Tooting Cluster on: 0208 871 5559/5229.

The Business Support Team will record contact and the Early Help practitioner will determine forward journey. All TACs (Teams Around the Child) meetings and planned work will be recorded and reviewed on EHITS. In cases where there is no consent given for an EHA, the School together with other practitioners would consider how the needs of the child might be met. If at any time it is considered that the child may be a 'Child in Need', as defined in the Children Act 1989, or that **the** 'Child has suffered Significant Harm or is likely to do so', a referral will be made immediately to Children's Social Care (MASH). The referral will most likely be made by the DSL, but any member of staff could do so.

See also Appendix 4 for flow chart setting out the process for staff when they have concerns about a child from KCSiE 2022. Effective monitoring systems will be used to assess the effectiveness of interventions and outcomes. The situation will be kept under constant review and consideration given to additional referrals (e.g. Children's Social Care) if the child's situation does not appear to be improving.

The School ensures that all staff are provided with the appropriate training and information with regard to Early Help process.

For more details please see '*Working Together to Safeguard Children*' and KCSiE 2022.

## 10. Children potentially at greater risk of harm (child who needs a social worker)

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Children may have a social worker and Child Protection Plan due to safeguarding or welfare needs. They may need help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behavior and mental health. The local authority informs the School if the child has a social worker and information would be shared between the two in order to fully safeguard and promote the welfare of the child. The School with the guidance of the local authority would make decisions for example how to respond to unauthorised absence, missing education, pastoral and academic support.

## 11. Children who are LGBT

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The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff at Finton endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff through promoting the Who Can Help Me? Posters around school. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and assemblies are used with resources that help counter homophobic, biphobic and transphobic bullying and abuse.

## 12. Mental Health and Counselling

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*(Please read Mental Health and Wellbeing policy for more details.)*

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. They further understand that where a child has suffered abuse and neglect, exploitation or other potentially traumatic adverse childhood experience it can have a lasting impact throughout childhood, adolescence and into adulthood. We are aware of how these children's experiences, can impact on their mental health, behaviour and education. The high staff to pupil ratio at Finton House means staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

We have a designated lead for Mental Health, who is the Assistant Head Wellbeing and they attend the termly governor Safeguarding & Wellbeing sub-committee meeting. In order to help our children, succeed, we recognise that the School plays an important role in supporting them to be resilient and mentally healthy. Only appropriately trained professionals would attempt to make a diagnosis of a mental health problem. We ensure that families have information and support, and where severe problems occur will ensure that appropriate referrals are made (with consent) to



specialist services e.g. Child and Adolescent and Mental Health Services (CAMHS). We also recognise that some children are more at risk of developing mental health problems than others. Nicola Blenkinsopp (SENCo) has an Extramural certificate in counselling skills and there are two highly qualified peripatetic school counsellors working at the School.

We offer a range of support, which includes bereavement support, counselling, social playgroups, Mindfulness, Y5/Y6 Mentoring groups and The Zones of Regulations. We are aware of the DfE's latest advice in SEND Code <https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>, and the Mental Health and Behaviour in schools Guidance, - <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

We recognise that staff working in the School who have been dealing with child protection issues may find the situation stressful and upsetting. We ensure that opportunities are provided for staff to be supported in these circumstances and to talk through any anxieties they may have. In the Early Years Foundation Stage (EYFS) there is formal supervision provided for staff on a regular basis. We will also consider what arrangements can be made to provide supervision for designated leads and any other staff members as appropriate. All employees have access to the Health Assured Employee Assistance Programme and the number to call for help and advice is 0800 030 5182.

### 13. Child on child Abuse (Child on Child) including Sexual Violence and Sexual Harassment

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*(For more details see the following policies: Pastoral Care, Anti-bullying and Technology and Online Safety policy plus DfE publications, 'Sexual Violence and Sexual Harassment between Children in Schools and Colleges' and KCSiE 2022 <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>, 'Sexual Offences under the Sexual Offences Act 2003', 'Human Rights Act 1998 (HRA) - article 3, 8, 14 and protocol 1, article 2. and Equality Act 2010)*

All staff are aware that children can abuse other children (often referred to as child on child abuse) and that it can happen both inside and outside school or online. There is a zero-tolerance approach at Finton House to abuse, and it will never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Staff understand, that even if there are no reports it does not mean it is not happening. If staff have any concerns regarding child on child abuse they would speak to the DSL, Deputy DSL or the Head.

As a school, we work to minimise the risk of child on child abuse through teaching the curriculum, assemblies, Finton Goals and Pupils' Council. We teach Relationship Education for all pupils through our RSE / PSHEE scheme of work and this covers the characteristics of healthy relationships. These are used at all stages of the child's development to tackle such issues as:

- healthy and respectful relationships;
- what respectful behaviour looks like;
- consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong; and
- addressing cultures of sexual harassment.

There is a high staff pupil ratio and supervision together with a culture with systems in place which enable children to confidently report abuse, knowing their concerns will be treated seriously. A pastoral page on Frog enables the older children to register their concerns out of school hours.



We will investigate and deal with any allegations robustly (*please see Pastoral Care policy*). Where needed risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion. Where there is a concern that a child in school may have behaved inappropriately, this will be passed immediately to the Head/DSL. They will discuss the matter with parents and it may be necessary to make a referral to Wandsworth Early Help, MASH or CAMHS (Child & Adolescent Mental Health Service) and/or police as appropriate. (Please see section on *Procedures for suspected Child Abuse* in this policy.)

We recognise that it is more likely that girls will be victims and boys' perpetrators, but that all child on child abuse is unacceptable and will be taken seriously. The alleged incident may be between two pupils not during school hours or online, however the incident will still be investigated and normal procedures followed as if during the School day. We will consider extra-familial factors and ensure we identify any children who are at risk of abuse or exploitation due to factors outside the School.

Managing situations where other children have abused children can be complex and stressful. Child on child abuse can manifest itself in many ways. This is most likely to include, but may not be limited to:

- Abuse in intimate personal relationships between peers
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, grabbing bottoms, breasts, genitalia and displaying pictures, flicking bras, lifting up skirts and photos or drawings of a sexual nature.
- Initiating/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse. For example about clothes or appearance, sexual jokes or taunting, sexual stories, making lewd comments or calling someone sexualised names.
- Online sexual harassment, which might include non-consensual sharing of sexual images (nudes & semi-nudes) and videos (referred to as sexting –); sexualised online bullying; unwanted and inappropriate sexual comments on social media; exploitation; coercion and threats. See *Appendix 2 for procedure to follow*.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual exploitation; coercion and threats.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

We are conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. There is also significant research evidence, which indicates that abuse is likely to be repeated without appropriate intervention and treatment. Harmful sexual behaviours in children may be (and often are) a symptom of either their own abuse or exposure to abusive practices or materials. Children who abuse others will be held responsible for their abusive behaviour, whilst being identified and responded to in a way, which meets their needs as well as protecting others.

## Sexual Violence or Sexual Harassment

*(For details, regarding definitions sexual violence and harassment please see Appendix 2.)*

Sexual violence and sexual harassment can occur between two children of any sex, from primary through to secondary stage. Staff are advised to maintain an attitude of **'it could happen here'**. Incidents and/or behaviours can be associated with factors outside the School, including intimate personal relationships. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely boys will be perpetrated by boys. When considering harmful sexual behaviours, ages of the children, the stages of development of the children and wider environmental factors are critical factors that would be considered. Sexual violence or sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. All victims would be taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. We recognise it is important that other children, adult students and school and college staff are supported and protected as appropriate.

The starting point to any incident is that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is not an inevitable part of growing up. We do not tolerate or dismiss sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys" or tolerate challenging behaviours (which are potentially criminal in nature). Dismissing or tolerating such behaviours risks normalising them. We recognise that such behaviours may reflect wider social factors beyond the School, such as everyday sexist stereotypes and everyday sexist language. We are also aware that staff can be victims of sexual violence or harassment and we have strategies to protect staff. See the School's Whistleblowing policy.

Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers are. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- The potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs.
- Communication barriers and difficulties overcoming these barriers.
- Their peers can target children who are perceived as being Lesbian, Gay, Bi, or Trans (LGBT). In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Procedure for dealing with an incident regarding sexual violence or sexual harassment

*(See also Part 5 of KCSiE – The immediate response to a report)*

The following situations are statutorily clear.

- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.

- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Disclosures from children are dealt with sensitively they are reassured that they are being taken seriously. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Wherever possible the DSL together with the deputy would manage the reporting. We are aware that the children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice or react to them. In some cases, the victim will not make a direct report e.g. a friend or a member of staff overhears a conversation that suggests a child has been harmed or a child's own behaviour might indicate something is wrong. If the report includes an online element, we would not view or forward illegal images of a child and follow advice from the below websites if viewing the image is unavoidable. UKCCIS: Sexting advice on the sharing indecent images of a child (including by children) and how to respond to reports of children sharing nude and semi-nude images and or videos. <https://www.gov.uk/government/organisations/uk-council-for-internet-safety>

Internet Watch Foundation (to potentially remove illegal images) - <https://www.iwf.org.uk/>

There is a helpline run by the NSPCC (0800 136 663 or [email at help@nspcc.org.uk](mailto:help@nspcc.org.uk)) to both support potential victims and provide advice to children and adults who are victims of sexual abuse in schools. This includes how to contact the police and report crimes, if they wish to, while parents and professionals can also get in touch.

The child would be reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. A victim would never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or made to feel ashamed. Nor would the victim ever be made to feel ashamed for making a report or their experience minimised. Confidentiality would not be promised at the initial stage, as it is likely the concern will have to be shared further (for example DSL/Head or MASH).

When there has been a report of sexual violence, the DSL (or a deputy) would undertake an immediate risk and needs assessment, which would consider the victim(s), the alleged perpetrator(s); and the other children (and if appropriate staff) at the School. The risk assessment would be recorded (written or electronic) and would be under review.

The DSL would consider the following:

- The wishes of the victim in terms of how they want to proceed. Victims would be given as much control as is reasonable and appropriate over decisions regarding how any investigation will be progressed and any support they will be offered. Wherever possible, the victim, if they wish, will be able to continue in their normal routine. Overall, the priority will be to make the victim's daily experience as normal as possible, so the School is a safe space for them.
- The nature of the alleged incident(s), including; whether a crime may have been committed and consideration of harmful sexual behaviour.
- The developmental stages and ages of the children involved.
- Any power imbalance between the children. For example, the alleged perpetrator(s) significantly older, more mature or more confident. Whether the victim has a disability or learning difficulty.
- If the alleged incident is a one-off or a sustained pattern of abuse. (Sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.)

- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familial harms and any necessary support for siblings following incidents.
- Are there ongoing risks to the victim, other children or staff?
- Other safeguarding factors outside of school including links to child sexual exploitation and child criminal exploitation.

In some cases of sexual harassment, for example, one-off incidents the School may take the view that the children concerned are not in need of Early Help or statutory intervention and that it would be appropriate to handle the incident internally, through utilising pastoral and anti-bullying policies (a risk assessment would be undertaken). Parents would also be involved. Alternatively, the DSL might decide to offer Early Help (See section on *Early Intervention and Help*) or to carry out a statutory intervention through a referral to the MASH, who might 'step-down' the concern to Early Help. Please see section on '*Procedures for suspected Child Abuse*' in this policy and KCSiE (2022). Whatever the response, it would be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. We are also aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems. We would always look out for potential patterns of concerning, problematic or inappropriate behavior and consider whether there are wider cultural issues within the School that enable inappropriate behavior to occur and where appropriate specific teaching and/or staff training be delivered to minimize the risk of it happening again.

The DSL would not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children.

If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. If the DSL decided to make a referral to MASH or the police against the victim's wishes, this would be handled extremely carefully, and reasons for which would be explained to the victim, and appropriate specialist support offered. It may be decided that the children involved do not require statutory interventions but may benefit from Early Help. The DSL would speak to MASH with regard to how the alleged perpetrator(s) and their parents be informed of the allegations.

Any report to the police will generally be in parallel with a referral to the MASH. Where the report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. NPCC guidance on when to call the police - <https://www.safe4me.co.uk/wp-content/uploads/2020/02/CYP-schools-guide.pdf>

Additional guidance is available in Part 4 & 5 of KCSiE 2022

<https://www.gov.uk/government/publications/keeping-children-safe-in-education>

Other useful advice and support is available from:

Sexual Assault Referral Centres (SARC) The Survivors Trust: Offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse and advice for parents.

<https://www.thesurvivorstrust.org/sarc>

NSPCC: Harmful sexual behaviour and signs, indicators and effects -

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexual-behaviour/signs-symptoms-effects/>

Childline; Provides free and confidential advice for Children -

[https://www.childline.org.uk/?utm\\_source=google&utm\\_medium=cpc&utm\\_campaign=UK\\_GO](https://www.childline.org.uk/?utm_source=google&utm_medium=cpc&utm_campaign=UK_GO)

[S\\_B\\_BND\\_Grant\\_Childline\\_Information&utm\\_term=role\\_of\\_childline&gclid=EAlaQobChMIIfLRh-ez6AIVRdDtCh1N9QR2EAAYASAAEgLc-vD\\_BwE&qclsrc=aw.ds](https://www.southbaynews.com/story/news/2019/05/01/childline-information/528111600270001)

NHS: Provides help after rape or sexual assault - <https://www.nhs.uk/live-well/sexual-health/help-after-rape-and-sexual-assault/>

National Crime Agency - <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/child-sexual-abuse-and-exploitation>

The National Organisation for the Treatment of Abusers (NOTA) - <https://www.nota.co.uk/>

The Brook sexual behaviours traffic light tool: [www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool](http://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool)

Thinkuknow from CEOP provides support for parents on staying safe online  
<https://www.thinkuknow.co.uk/>

NICE Guidance: <https://www.nice.org.uk/guidance/ng55>

Child and Adolescent mental health services (CAHMS) - <https://www.swlstg.nhs.uk/our-services/find-a-service/service/wandsworth-camhs>

Rape Crisis or The Survivors Trust: <https://rapecrisis.org.uk/>

Bullying Alliance (preventing and responding to sexual bullying): <https://anti-bullyingalliance.org.uk/tools-information/all-about-bullying/sexual-and-sexist-bullying>

UK Safer Internet Centre: <https://www.saferinternet.org.uk/>

Grooming - <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming/>

LGFL 'Undressed' <https://undressed.lgfl.net/> schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

## 14. Children Toileting Arrangements

### Procedures to be followed when a child has wet or soiled itself:

- There needs to be two members of staff present when changing a child unless there is a designated member of staff approved by parents to do this on a toileting plan.
- Staff should wear gloves and apron stored in the first aid cupboard over the yellow first aid bin in 171 or the changing cupboard in Reception.
- Encourage children to remove their own clothing.
- Encourage the child to wipe itself independently. Wipes may be supplied by a parent or wet wipe used from the 171 first aid cupboard or the Reception cupboard.
- Soiled clothes to go in a plastic bag for the child to take home.
- Replace any soiled clothes with ones from those stored lost property cupboard or the Reception changing cupboard.
- All staff to wash their hands before and after every change and to dispose of gloves and aprons in the yellow bin on the ground floor of 171.

- Incident recorded on toileting record sheet in Child Protection and Safeguarding folder on W drive. When recording it is vital to recognise if any patterns of accidents occur to put intervention in place.
- If the child has soiled itself, parents will be informed immediately and asked to be picked up depending on the state of the child.
- If the child has wet itself, they will be changed at school and the parents will be informed at pick up.

A care plan will be drawn up and agreed with parents for all children who require intimate care on a regular basis, for example with toileting or removing wet/soiled clothing. Two adults will always be present when removing wet/soiled clothing from a child (this is always the case in EYFS). Please see toileting care plan for detailed procedures and children's individual Healthcare plans and advice can be sought from the Deputy DSL for EYFS.

## 15. Children Missing from Education

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*Read in conjunction with 'Children missing in education: statutory guidance for local authorities' updated Sept 2016, DfE', Registration policy and Government statutory guidance 'Children missing education - <https://www.gov.uk/government/publications/children-missing-education>*

All children regardless of their circumstances are entitled to a full-time education, which is suitable to their age, ability and aptitude, and any special educational needs they may have. Children missing from education, particularly persistently, can be a warning sign for a range of safeguarding issues. We are also aware that it is important to act when problems are first emerging. Wherever possible we hold more than one emergency contact number for each child plus that of their parent(s)/carer.

Children who are of particular risk are:

- Children at risk of abuse/neglect – this may include sexual abuse or sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems and risks of substance abuse, travelling to conflict zones, female genital mutilation and risk of forced marriage.
- Children of Gypsy, Roma and Traveller (GRT) families
- Children of Service Personnel
- Missing children and runaways
- Children who cease to attend a school
- Children of new migrant families
- Children supervised by the Youth Justice System

A child going missing from education, or not attending regularly is a potential indicator of abuse or neglect. These are children:

- Who are not present for registration and the School Office or Class Teacher has received no message.
- Who suddenly leave the School with either a few days' notice or no notice at all.
- Who have poor attendance and have interrupted school attendance.
- With authorised absences e.g. holidays during term time.

The Registrar fulfills our legal duty to report certain attendance issues to the child's local authority of residence when a child's name is to be removed from the admission register at a non-standard transition point. This duty does not apply at standard transition points – where the child has completed the School's final year. Examples of non-standard transition points when a child is deleted from the School's admission register are:



- When a child leaves the School at a non-standard transition point i.e. before the end of Year 6.
- The child has been continuously absent from school for a period of not less than twenty school days and the absence was unauthorised.
- When the child has been permanently excluded from the School. The School would arrange full-time education for excluded pupils from the sixth school day of a fixed period of exclusion.
- The child can no longer attend the School as they do not meet the academic level or the School can no longer meet their special educational or medical needs.
- Failure to attend regularly.
- Child was entered on the admission register but failed to attend the School.
- When the next school is not known.
- When a child has been taken out of school to be home educated.
- When the family has apparently moved away.
- When the child has been certified as medically unfit to attend. The GP has certified that they are unlikely to be in a fit state of health to attend school before ceasing of the School age range.
- Are in custody for a period of more than four months due to a final court order and the Governors do not reasonably believe they will be returning to the School at the end of that period.

The Registrar electronically completes a leaver or starter form to the Local Authority Education Welfare Service every week, showing if any child has been registered or de-registered that week. This duty does not apply when a pupil joins or leaves the School at a standard transition point e.g. in Reception or Year 6.

The child's name may be removed from the admission register under any of the fifteen grounds set out in the regulations. See '*Children missing in education - Statutory guidance for local authorities - Annex A: Grounds for deleting a pupil from the School admission register*' - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

We would also notify the local authority within five days of adding a child's name to the admission register at a non-standard transition point.

*\* Notification to the local authority includes: full name of the child, name, address and telephone number of parent and the child's future address and destination together with new school details and expected start date, if applicable, and the grounds in regulation 8 under which the child's name is to be removed from the admission register - see Annex A: Children missing in education: statutory guidance for local authorities Sept 2016.*

Going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect. We ensure staff are alerted to the potential risks of poor or non-attendance and cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as travelling to war zones, sexual abuse or exploitation, child criminal exploitation, mental health problems, FGM and forced marriage. Parents are aware of procedures with regard to informing the School of any absences.

School Procedure: please see separate Registration Policy



## 16. Elective Home Education

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Some parents may decide to self-educate their child. However, they may not have the child's best interest at heart and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent has expressed their intention to remove a child from school with a view to educating at home, we would hold a meeting with the parents. Ideally, this would be before a final decision has been made, to ensure the parents have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

The requirement to report to the LA of a parents' intention to remove a child from the school does not apply where a child's name is deleted after they have completed their final year at the School in Year 6, unless the local authority have asked to be informed about such deletions.

## 17. Looked After Children & Private Fostering

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### Looked After Children

Catherine Hitchcock, who is the lead DSL and Deputy Head, is the designated teacher to promote the educational achievement of children who are looked after and she will work closely with other agencies. We recognise that the most common reason for children becoming looked after is abuse and/or neglect. The appropriate staff will have the information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility as well as the information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. As the designated teacher is the DSL, she will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. Advice and support is available from Nova Levine, [nova.levine@richmondandwandsworth.gov.uk](mailto:nova.levine@richmondandwandsworth.gov.uk) 020 8871 7351 or mobile: 07557 295630.

If a close relative is looking after a child, e.g., aunt they are deemed close relatives in law and there is no need to notify the local authority. However, the School would need to know who to contact in the event of an emergency. If parents hand that responsibility over to the close relative then the School would require that in writing.

The School recognises that children who were previously Looked after Care (LAC) and other children living away from home are also additionally vulnerable and may continue to require support at a higher level.

### Private fostering

*Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'.*

A connected person is defined as a 'relative, friend or other person connected with a child'. The latter is likely to include person(s) who have a pre-existing relationship with the child, for example, a teacher who knows the child in a professional capacity.

Private foster carers can be from the extended family, e.g. a cousin or a great aunt, but cannot be a relative as defined under the Children Act 1989, section 105:

*'A relative under the Children Act 1989 is defined as a 'grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent'.*

The local authority are notified if a child is living with someone who is not his or her parent or a 'connected person' for longer than 28 days. We would notify MASH if a child were being privately fostered. The local authority would need to be satisfied that the placement is suitable and the child is safe. To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous but can include occasional short breaks. For advice about private fostering, contact Specialist Private Fostering Senior Social Worker (Beatrice Ogunbowale - 020 8871 6471, [Beatrice.ogunbowale@richmondandwandsworth.gov.uk](mailto:Beatrice.ogunbowale@richmondandwandsworth.gov.uk))

## 18. Radicalisation (Prevent)

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(Please see Appendix 7 for risk assessment for children being drawn into radicalisation or drawn into terrorism/extremist activity.)

Children are vulnerable to extremist ideology and radicalisation. We are subject to a duty under section 26 of the Counter-Terrorism and Security Act of 2015 ("the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty and the School supports the Prevent Strategy, which works to prevent the growth of issues that create a climate which encourage radicalisation and extremism, which in turn can lead to acts of violence or terrorism. For more information see - *Revised Prevent duty guidance: for England and Wales* - <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

*Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.* (KCSiE 2022)

*Extremism is the vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.* (Source KCSiE 2022)

*Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.* (Source KCSiE 2022)

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). Any concerns should be raised with the DSL (or deputies) or if an adult, the Head or Bursar who is the Whistleblowing Officer (see Whistleblowing policy for staff)

Below are some common signs that someone may be going through a radicalisation process:

### PHYSICAL CHANGES

- Unexpectedly or suddenly, begin to wear religious attire, grow a beard or shave their head.
- Get tattoos displaying various messages.
- Come home with unexplained gifts and/or clothing – groomers will sometimes use gifts such as mobile phones to engage a young person.
- Been influenced by extremist preachers.

### SOCIAL, EMOTIONAL and VERBAL CHANGES

- They complain (sometimes with anger) about government policies, especially foreign policy.
- Advocate violence or criminal behaviour, talk about 'seeking revenge' or exhibit erratic behaviour such as paranoia and elusion.
- Sympathise with radical groups, begin to visit extremist websites, networks or blogs.
- Attend demonstrations for extremist causes.
- Begin to cut ties with existing friends, family or community.
- Start to associate with known radical preachers/extremists.
- Become dependent on social networks.

## WHO IS MOST AT RISK?

Those going through a difficult time for example:

- Finding it hard at school
- Finding it difficult to make friends
- Grieving the loss of a loved one
- Feeling confused about their religious views
- Serving time in prison (or a close relative in prison).

Extremist 'groomers' often prey on young people by playing with their emotions, manipulating them and giving them a sense of 'purpose' i.e., encouraging them to join for 'humanitarian reasons'.

We recognise that specific background factors may contribute to vulnerability, which are often combined with specific influences such as family, friends or online. The child may have specific needs for which an extremist or terrorist group may appear to provide the answer. We recognise that the internet and the use of social media are a major factor in the radicalisation of young people. All staff members are aware of these issues and are alert to the fact that changes in children's behaviour could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. The DSL is the School's Prevent lead with support from Deputy DSLs. They are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. The staff have received on-going Prevent awareness training to ensure they can identify children at risk of being drawn into terrorism and to challenge extremist ideas during staff meetings. Staff complete the Educare module on Prevent.

Finton House teaches a broad and balanced curriculum, which promotes the spiritual, moral, cultural, mental and physical development of children and prepares them for the opportunities, responsibilities and experience of life. Finton House has an environment in which children feel safe to discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. We are an inclusive school, which values citizenship and a sense of belonging. Children are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others. Please also read the RSE / PSHEE, Religious Education and Early Years policy.

Staff are aware that a visiting speaker or educational, SEN or medical specialist who visits the School may have extremist views or links with radical organisations. Alternatively, have views that contradict 'Fundamental British Values' of individual liberty and mutual respect and tolerance for those of different beliefs and faiths. We consider the risk before any visitor comes into school, any concerns are raised with the DSL, and a risk assessment form is completed by the School Office and is monitored weekly by the DSL. All visitors to the site are signed in/out electronically at the School Office. Visitors wear either a green or a red identification badge. Those with a green badge have completed the relevant checks in accordance with the Safer Recruitment, Selection and Disclosure Policy and may attend the site without being accompanied at all times by a member of Finton staff. A member of Finton staff must supervise those with a red badge at all times.

We recognise that the most likely source of radicalisation exposure will be online and that all staff need to be aware of the risks posed by the online activity of extremist and terrorist groups such as ISIS. Our Acceptable Use policies for children & parents and staff cover the dangers that can be caused by the internet/social media to bully, groom, radicalise or abuse children; there are well-developed strategies in place to keep learners safe and to support them in learning how to keep themselves safe. Online safety training takes place regularly for children, parents and staff. For more details, please see the Technology Policy including Online Safety.

As with all matters pertaining to the maintenance of a safeguarding culture within the School, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL or Deputy DSLs immediately. If there are any concerns regarding a member of staff procedures outlined in the *Whistleblowing policy* should be followed.

If any concerns arise, or are disclosed by a child, they will be responded to following normal safeguarding processes via MASH and advice would be sought from Local Authority colleagues, (either Prevent coordinator [-prevent@richmondandwandsworth.gov.uk/](mailto:-prevent@richmondandwandsworth.gov.uk/) Or safeguarding services) if necessary. They would then make a referral to the Channel panel.

Channel – This is a voluntary, confidential support programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred. They will determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the School may be asked to attend the Channel panel to help with the assessment. An individual's engagement with the programme is voluntary at all stages.

The DSL will consider if it would be appropriate to share any information with the new school in advance of the child leaving.

For guidance on Channel (Feb 2021) see - <https://www.gov.uk/government/publications/channel-guidance>

Any concerns over adults can be made to the Wandsworth Community Safety Unit (CSU) – Robyn Thomas or Alva Bailey, Phone: 020 3276 2610, [Communitysafetyunit-ww@met.police.uk](mailto:Communitysafetyunit-ww@met.police.uk), [Thomas@richmondandwandsworth.gov.uk](mailto:Thomas@richmondandwandsworth.gov.uk) or [Bailey@richmondandwandsworth.gov.uk](mailto:Bailey@richmondandwandsworth.gov.uk), Wandsworth Police Station, 146 Wandsworth High Street, London SW18 4J - [content.met.police.uk/Home](http://content.met.police.uk/Home). These details are prominently displayed in the staffroom. The local police force non-emergency number for advice is 101 and in an emergency use 999 or 112

CEOP may also be contacted <http://www.ceop.gov.uk>. Online material promoting terrorism or extremism can be reported anonymously using <https://www.gov.uk/report-terrorism> the Gov.UK website. The UK Safer Internet Centre has a Professionals Online Safety Helpline - <https://www.saferinternet.org.uk/helpline/professionals-online-safety-helpline> - 0344 381 4772

Non-emergency advice is available from the DfE dedicated helpline and mailbox for non-emergency advice: 020 7340 7264 and email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

## 19. Allegations made Against or Concerns raised in Relation to Staff, Volunteers, Governors, Supply/Agency or Contracted Staff

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*(Read in conjunction with the 'Whistleblowing' Policy.)*

### Recruitment Checks

All staff, peripatetic teachers, parent readers, volunteer (of more than 5 days) and Governors at Finton House School have an enhanced DBS certificate, which includes barred list information.

Any supply/agency (teacher, assistant or administrator), contracted staff or peripatetic teacher covering a club for their colleague must have a completed contractor declaration completed and submitted to the Bursar by their employer. They must also provide proof of identification and bring their DBS certificate on arrival.

PGCE students are checked by their university/college and notification is supplied to the School. Work Experience visitors are not checked or a volunteer in school if they are in once a week or more often, or on 4 or more days in a 30-day period however, they are never left unsupervised with children. There is also a risk assessment carried out for their visit. If they are in more than this they have, an enhanced DBS (including barred list check) carried out. For more details, please refer to Recruitment, Selection & Disclosures Policy.

In addition, as part of the shortlisting process Finton House will carry out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview.

## Concerns and Allegations

### Procedure for Low-Level Concerns

*(See Part 4, KCSIE 2022 for more details & the School's low-level concern/staff code of conduct policy).*

These are allegations/concerns that do not meet the harms threshold. Concerns may arise in several ways and from a number of sources. For example, suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the School; or as a result of vetting checks undertaken.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff behaviours code of conduct and including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on personal devices e.g. mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating or offensive language.

At Finton we promote an open-door and transparent and trusting culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with supportively, promptly and appropriately. This creates an ethos in which all low level concerns are shared, recorded and dealt with appropriately. This helps us to:

- Identify concerning, problematic or inappropriate behaviour early.
- Minimise the risk of abuse.
- Ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and the Finton Goals.

It is made clear to staff about what appropriate behaviour is, and they are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others. Staff are encouraged and should feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Staff are required to share any low-level safeguarding concerns via Confide with the Head who will address unprofessional behaviour and support the individual to correct it at an early stage. They will provide a responsive, sensitive and proportionate handling of such concerns when they are raised and will make any adjustments if there are weakness within the School's safeguarding system.

Where a low-level concern relates to a person employed by a supply/agency or a contractor to work in a school or college, that concern will also be shared with the Head. It will be recorded in accordance with the school's low-level concern/staff code of conduct policy. Their employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

All low-level concerns recorded on Confide will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted. If the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

These records will be kept confidentially and securely on Confide accessed only by Head and DSL. The Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies may be revised or extra training delivered to minimise the risk of it happening again.

The information will be retained until the individual leaves the employment of the School. The School would only provide substantiated safeguarding allegations in references. Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) would not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

If the concern has been raised via a third party, the Head would collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, to the individual involved and any witnesses. The information collected will help categorise the type of behaviour and determine what further action may need to be taken. Please also refer to section on *'Guidance for Staff in Dealing with a Disclosure'*.

### Procedure for Allegations that meet the harms threshold

We recognise that there will be occasions when a child at the School, or a parent or another person may make an allegation against a member of staff or volunteer. The term allegations refers to concerns reported or raised that might indicate a person has caused harm to a child, acted in a way that created potential serious risk to a child or would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity.

Where the School is not the employer of an individual we still have responsibility to ensure allegations are dealt with appropriately and will liaise with relevant parties (this includes supply



teachers and volunteers). It is essential that any allegation of abuse is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

The majority of allegations against staff, volunteers, supply/agency or contracted staff or Governors relate to their behaviour in the workplace. However, some concerns may relate to their personal life or the care of their own children. In some cases, there may have been an allegation of abuse against someone closely associated to them and this person may pose a risk of harm to the children the staff member or volunteer.

We expect any member of staff, supply/agency or contracted staff or volunteer who is concerned about the behaviour or presentation of a colleague, or sees an incident, which concerns them, to discuss this as soon as possible with the Head. It may be that they:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behave or may have behaved in a way that indicates they may not be suitable to work with children and this includes behavior that may have happened outside school, which is known as transferable risk.

All staff are encouraged to raise concerns about poor or unsafe practice and potential failures in the School safeguarding regime to the DSL or Head. It is important if there are any occasions that may possibly lead to a misunderstanding or accusation from others that the adult concerned protect himself or herself by informing the DSL or Head.

### Preventive Measures to Avoid an Allegation

All staff, supply/agency or contracted staff and volunteers who have day-to-day contact with children in a variety of situations are vulnerable to accusations of abuse. Adults in the School are made aware (including EYFS staff) of the fact that they do have to be very careful and are aware of the following guidance:

- Never too engage in inappropriate electronic communication with a pupil or to use mobile telephone, personal camera or iPad to take photos or videos of children (*see Technology Policy and Including Online Safety & AUA's*).
- Not to display any photos of children on any social media site etc.
- Avoid being over familiar with children and parents.
- If working with a child one to one, and there is no glass window into the room they should leave the door open.
- To wear appropriate clothing. (*See Staff Dress Code in Employment Handbook*)
- Not convey a pupil in their own car unless they have obtained parental consent in writing and informed the Bursar.

A 'no touch' approach is impractical for most staff and in some circumstances may be inappropriate. The general culture of 'limited touch' is adapted, where appropriate, to the individual requirements of each pupil. Wherever possible a child will dress itself and tie back their own hair, although we recognise that with very young children and SEN children that some assistance may be required, but this would be kept to minimum. There may be times when it is entirely appropriate and proper for staff to have physical contact with pupils, but this is only in ways appropriate to their professional role. Physical contact may be appropriate in the following circumstances:

- When a pupil needs to get comfort or reassurance e.g. following an accident or personal crisis;
- When a pupil needs encouragement to attempt a new challenge e.g. to climb on to a piece of apparatus; or



- When there is a need to take urgent action to avoid an incident or injury.

Staff use their professional judgement at all times. Physical contact is always appropriate for the age, understanding and sex of the child and never threatens or is sexually inappropriate. Staff are sensitive to an individual's cultural background and any special educational needs.

Staff do not have unnecessary physical contact with pupils and are alert to the fact that pupils or onlookers can misconstrue minor forms of friendly physical contact. There is no physical contact when disciplining a child, as even the smallest touch to the arm can be misinterpreted at times like this when voice tone is likely to be aggressive. With regard to use of physical intervention, please see *Positive Handling and Physical Intervention Policy*.

If removing wet/soiled clothing, please see section on *'Toileting Arrangements' in this policy*.

Children apply sunscreen themselves and where appropriate, for example in the EYFS, children may be supported with this. For more details, please see First Aid & Medication Policy.

*(For more information, please see the Employment Handbook for Staff Behaviours and the Technology including Online Safety policy.)*

Procedures followed for dealing with an Allegation (see Part 4 of KCSiE 2022 for greater detail)

Relationships with children may in rare instances lead to allegations against them being made by pupils, by another adult within or outside of the organisation, parents/carers or as a result of vetting checks undertaken. We will contact Children's Social Care and as appropriate the police immediately if we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency.

These allegations may be false, malicious or misplaced and may be either deliberate or innocent of such intent. However, all allegations or suspicions against an adult, whether permanent, temporary, supply/agency or contracted staff or volunteers are taken seriously and considered as requiring a child protection response/enquiry.

Procedures are followed as outlined in *'KCSiE' Sept 2022 and 'Working Together to Safeguard Children' and Wandsworth Safeguarding Children Partnership*.

<http://www.wscp.org.uk> - For Wandsworth LADO procedures.

- If a staff member has concerns about another staff member, DSL, volunteer, supply staff or peripatetic teacher then this is referred to the Head (the 'Case manager'). If the Head is absent or is the person against whom the allegation is made, the Chair of Governors or Child Protection Governor must be contacted immediately. The person to whom the allegation or concern is first reported will treat the matter seriously and keep an open mind. They will make a written record of the information, including the time, date and place of incident(s), persons present and what was said. The written record will be signed and dated. They will not investigate the matter or interview the member of staff, child concerned or potential witnesses. They may call the LADO (Local Authority Designated Officer - Anita Gibbons) for advice (07974 586461) - [Anita.Gibbons@richmondandwandsworth.gov.uk](mailto:Anita.Gibbons@richmondandwandsworth.gov.uk) - Wandsworth Town Hall, Wandsworth High Street, London SW18 2PU.
- The School will apply common sense and judgement, deal with allegations quickly, fairly and consistently and provide effective protection for the child and support the person subject to the allegation. Before contacting the LADO the Head or Chair of Governors would conduct basic enquires to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example: was the individual in the School at the time of the allegation(s), did the individual, or could they have, come into contact with the

- child, are there any witnesses and was there any CCTV footage? Where it is clear that an investigation by the police or Children's Social Care is unnecessary, the Case Manager may still wish to discuss the case with the LADO for advice.
- If there is cause to suspect there is foundation to the allegation, the Head or Chair of Governors would complete a LADO form and a MARF would be emailed to MASH ([MASH@wandsworth.gov.uk](mailto:MASH@wandsworth.gov.uk)). The referral forms would be completed and emailed within 24 hours (through using Egress). The MARF referral is sent to MASH for them to decide if any S47 enquiry is needed for the child and where any issues for a child who may be at risk or significant harm can be assessed promptly. MASH would also liaise with the LADO and processes put in place if necessary in parallel with the LADO. There may be instances in which the police will be informed immediately as well as Children's Social Care.
  - The MASH then refer the allegation to the duty LADO for a decision with regard to the way forward with the member of staff. The LADO will advise on whether the police should be contacted and whether or not there is sufficient substance in the allegation to warrant an investigation. They may judge that the threshold has not be met and hand the investigation back to the School (often with their oversight). The School will be required to hold an Internal Management Investigation (IMI) meeting. They will advise the School about informing the parents of the child or children concerned, which would usually be done at the earliest appropriate opportunity, unless doing so will impede the disciplinary or investigative processes. They will also advise on how much information should be disclosed to the accused person. The decision whether or not to investigate further lies with the child protection agencies. Parents and carers would be made aware of the requirement to maintain confidentiality about any allegations whilst investigations are ongoing as set out in section 141F of the Education Act 2002. If parents or carers wished to apply to the court to have reporting restrictions removed, they would be told to seek legal advice. The School would make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
  - Subject to restrictions on the information that can be shared, the Head (the 'Case Manager'), will as soon as possible after consulting with the designated officer(s), inform the accused person about the nature of the allegation and will provide them with as much information as possible at that time. They will be advised how enquiries will be conducted and the possible outcome (e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body). They will also be advised that they must not discuss the allegation with anyone else, but should contact their union, professional association or seek the advice of a solicitor. The Head (Case Manager) will appoint a named representative (colleague) to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Social contact with colleagues and friends would not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.
  - The School might decide to or have to consult legal advisers and this may involve access to information.
  - Suspension maybe considered by the Head (Case Manager) or Chair of Governors but not before advice has been sought from the designated officer(s). If the designated officer(s), police and Children Services have no objections to the member of staff continuing to work during the investigation, the suspension would not be an automatic response when an allegation is reported. All options to avoid suspension would be considered, prior to taking this step and consideration given to the potential permanent professional reputational damage to staff that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intent. Based on assessment of risk, the following alternatives would be considered by the Case Manager and the governors before suspending a member of staff:
    - Redeployment within the School so that the individual does not have direct contact with the child or children concerned.

- The child or children may move to classes where they will not meet the member of staff, but this decision would only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It would be made clear that this is not a punishment and parents have been consulted.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying to alternative work in the School so the individual does not have unsupervised access to children.

Suspension would be considered in a case where there is cause to suspect a child or other children at the School is/are at risk of harm or the case is so serious that it might be grounds for dismissal. If immediate suspension were considered necessary, the rationale and justification for such a course of action would be agreed and recorded by both the Case Manager and the designated officer(s). Children's Social Care or the police may give their view to the LADO but they cannot require the Case Manager to suspend a member of staff or a volunteer. However, where a strategy discussion, or initial assessment, concludes that there should be enquiries by the Children's Social Care, and/or an investigation by the police, the LADO would canvass police and Children's Social Care for views about whether the accused member of staff should be suspended from contact with children. Police involvement does not make it mandatory to suspend a member of staff; this decision would be taken on a case-by-case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

- The power to suspend would rest with the Chair of Governors. This would also include what alternatives to suspension have been considered and why they were rejected. If it were deemed appropriate to suspend the person, written confirmation would be given within one working day, giving as much detail as appropriate for the reasons for the suspension. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

In cases where the School is made aware that the Secretary of State has made an interim prohibition order. In respect of an individual who works at the School, immediate action would be taken to ensure the individual does not carry out work in contravention of the order i.e. pending the findings of the TRA (Teaching Regulations Agency) investigation, the individual must not carry out teaching work.

Where the allegation is against an individual not directly employed by the School where disciplinary procedures do not fully apply, the School would still ensure allegations are dealt with properly.

- The designated officer(s) passes on the information to the Child Protection Co-ordinator (CPC) who will oversee the allegations and liaise with other agencies. They arrange an Allegations Against Staff and Volunteers (ASV) meeting, which a multi-agency meeting is chaired by the CPC to exchange information and to decide on formal investigation processes, which may include police investigation. The following definitions are used when determining the outcome of allegation investigations (*for more details on procedures for each see Part 4 of KCSiE 2022*):
  - Substantiated: there is sufficient evidence to prove the allegation.
  - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation.
  - False: there is sufficient evidence to disprove the allegation.
  - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
  - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months. For all cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week.

- Parents or carers would be kept informed about the progress of the case but information will be limited in order to protect the privacy requirements with regard to the staff member. They would be told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child would be told the outcome in confidence.
- The School would make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act of 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with the offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegations. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so if a judge lifts restrictions in response to request to do so. In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless the person is charged with a criminal offence.

The Head or Chair of Governors would take advice from the designated officer(s), police and Children's Social Care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest when it should arise.

Any details of allegations that are found to have been false, unsubstantiated or malicious will be removed from personnel records and not included in employer references. This includes repeated concerns or allegations, which have all been found to be false, unsubstantiated or malicious. For all other allegations there will be a comprehensive summary of the allegation. Details of how the allegation was followed up and resolved and a note of any action taken and decisions reached. It will be kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record is retained at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer. Finton House School has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA - <https://www.iicsa.org.uk/>), for the term of the inquiry.

The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult. This is where the harm test

is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe the individual has committed a list relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, and who have been removed had they not left. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS. The DBS will consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual. The School will consider making a referral via the Teacher Regulation Agency (TRA) where a teacher has been dismissed or would have been dismissed had he/she not resigned and a prohibition order may be appropriate as required by sections 141D and 141E of the Education Act 2002. The reasons such an order would be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

### Supporting those involved

The welfare of the child will be paramount and this will be our prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. The School will offer appropriate welfare support and recognises the sensitivity of the situation. Information will not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation. The School will do what they can to manage and minimise the stress caused by the allegation:

- Inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary.
- Advise the individual to contact their trade union representative, or a nominated colleague for support.
- Appoint a named representative to keep the person informed about progress of the case.
- Provide access to counselling or medical advice where appropriate through Health Assured, 0800 030 5182 or via [www.healthassured.org](http://www.healthassured.org)
- Not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved will be:

- Formally told about the allegation as soon as possible. The Case Manager should consult the LADO and where involved Children's Social Care and/or the police on what information can be disclosed.
- Kept informed about the progress of the case, only in relation to their child. However, limited information subject to privacy requirements might be shared with regard to the staff member e.g. suspension, working at home etc.
- Made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002.

## 20. Information Sharing and Managing the Child Protection & Safeguarding Files.

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*(Read in conjunction with Data Protection Policy and sections in this policy on 'School Procedure for Suspected Child Abuse', 'Allegations against Staff or Governors' and 'Early Intervention & help' as well as KCSiE 2022 & Chapter 1 of 'Working together to safeguard children' last updated 2022.)*



KCSiE 2022 states, '*The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.*'

We have due regard to the relevant data protection principles which allow us to share information, as provided for in the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). We are allowed to store and share information for safeguarding purposes, including information, which is sensitive and personal, and would be treated as 'special category personal data.' We would not under the GDPR, as supplemented by the Data Protection Act 2018 provide pupils' education data where the serious harm test under the legislation is met. We follow Wandsworth (and other local boroughs) procedures with regard to sharing information with safeguarding partners.

Information is shared regularly when appropriate with individual staff face to face or through email. Information on individual children may also be shared at the weekly staff meeting or through a whole school email e.g. court orders regarding access, wellbeing of the child which is going through a difficult time at home etc. We are proactive on sharing information as early as possible with other organisations, agencies and practitioners as required in order to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where local authority Children's Social Care already knows a child.

Whilst, among other obligations, the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information will not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

When children leave the School the DSL ensures their child protection/safeguarding file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. For all leavers at the end of the summer term the DSL has a conversation with the DSL of the child's new school to ensure any support can be put in place prior to the child starting the new school e.g. counselling. Hardcopies of records are posted recorded delivery in the post and safe receipt of records is then confirmed by the DSL of the incoming school.

Data relating to allegations of sexual abuse would be preserved by schools for the term of the inquiry (*see IICSA website for more details*). All other records about allegations against staff would be retained until the accused has reached normal pensionable age or a period of 10 years from the date of the allegation if that is longer.

The seven golden rules for sharing information are:

*(The below are procedures the DSL or Head would usually be responsible for.)*

- Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the



facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.

- Understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.
- Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
- Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

For support see Government Data Protection Tool Kit (Sept 2018)  
<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

The DSL ensures that the child protection and safeguarding files are kept up to date. All information is confidential and stored securely on CPOMS. Concerns and referrals are kept in individual child protection files and any hard copies of records are kept locked in a secure cabinet.

Records include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

On the School's Child Protection and Safeguarding software CPOMS the DSL can record details of meetings, incidents etc. The DSL also has a Child Protection and Safeguarding folder within their OneDrive on the Finton House dashboard and individual folders can be shared with members of the DSL team. There are children's records here prior to when the School switched to the Engage data base in September 2019.

All information is only shared by those who need to see it and when material is shared this happens in line with information sharing advice as set out in KCSiE 2022/GPDR.

## 21. Training of Staff and Governors

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The DSL ensures that all staff are annually trained on the updates KCSiE. Any new member of staff or Governor has to complete training in child protection and safeguarding/radicalisation (either face-to-face or online training) and to be aware of the School's practice together with who the DSLs are.

All staff, governors, parent readers, peripatetic teachers and volunteers have been provided with a copy of 'KCSiE' Part One and Annex A: Information for all school and college staff', Sept 2022. Those staff who do not work directly with children read either Part One or Annex A (a condensed version of Part One). They have signed to say they have read and understood this document along with the Finton House Child Protection and Safeguarding policy. The above updated documents are reissued to everyone at the start of the academic year.

There is weekly staff training and updates on an aspect of safeguarding, child protection and online safety. The training notes/presentation is circulated to all staff on Frog (VLP) and staff sign to confirm they have been compliant. This training ensures that staff understand 'KCSiE', are updated on changes to policy, Wandsworth's Children's Social Care and Early Help procedures and to reinforce aspects of the policy and other relevant policies. There are also email updates circulated to staff on any changes or information from Wandsworth or the DfE. We recognise that there is a variety of expertise within the staff team and will provide opportunities for staff to contribute to and shape safeguarding arrangements and policy.

At weekly meetings there is a safeguarding item on agenda and this provides staff with the opportunity to discuss safeguarding and child protection arrangements in the School. The Governor with responsibility for child protection and safeguarding carries out spot checks each term through questioning a range of staff on their level of understanding with regard to recent training provided. The audit, which governors, parent readers, peripatetic teachers and staff complete, is also used as a tool to assess the level of understanding and to identify future training.

The DSL, Deputy DSLs and Head receive Level 3 training every two years. Training covers inter-agency working, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children. The DSL and Deputy DSLs attend Wandsworth twilight meetings and specific training provided each academic year (this equates to a least one day per year). The Deputy DSL in the EYFS receives two yearly training with specific focus on the EYFS.

For Prevent training see Section 18 of this policy.

All interviewees including peripatetic teachers and parent readers are asked if they have received safeguarding/child protection training and if so when. If they have received training within the last three years they are required to produce a certificate or a letter from their previous employer stating when the training took place (the Deputy Head, DSL follows up on this). If not, they are required to complete relevant child protection & safeguarding Educare and online safety modules. A service, which the School subscribes to. Some peripatetic teachers may complete the NSPCC online training at their own expense and produce a certificate before starting work in the School.

All new members of staff at Finton House meet with the DSL to discuss the following: Aspects of the *Health & Safety, Safeguarding/Child Protection, First Aid & Medication, Children Missing during the School Day, 'Whistleblowing', Staff behaviours (See Employment Handbook), Positive Handling & Physical Intervention, Anti-bullying, Acceptable use of Digital Resources, Technology Policy Including Online Safety, Supervision of Pupils (Section B of Staff Handbook)* and copies of all the policies are provided electronically prior to starting work.

Governors receive Safeguarding training every three years (online Educare or face to face). A new governor who has received child protection and safeguarding training within the last three years has to produce a certificate, which is kept on file. The DSL provides them with documentation, which includes a copy of Part One and Annex A of 'KCSiE' (Sept 2022) and the School's Child Protection and Safeguarding policy. If they don't have direct contact with children read either Part One or Annex A (a condensed version of Part One).

All staff and children receive online safety training annually. Parents are invited to attend online safety seminars conducted by leading speakers in the digital safety field. The Assistant Head Technology updates parents and provides useful website links and information about safety controls that can be added to apps/software via the Parent Dashboard on Frog. Our frequency of training follows the guidance of Wandsworth. There is Excel spreadsheets recording the names of all staff and governors and when they last received various safeguarding training.

## 22. Other related policies

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All the below also include EYFS.

Child who goes missing during the School day *(Please refer to the separate policy for details.)*

Children with Special Educational Needs & Disabilities *(Read in conjunction with Special Educational Needs Policy, Positive Handling and Physical Intervention policy and sections on 'Children Who Abuse Other Children including Sexual Violence and Sexual Harassment' and 'Positive Handling & Physical Intervention' within this policy.)*

Finton House provides a school environment in which all pupils, including those with SEND feel confident and able to discuss their concerns, providing support with communication difficulties where needed, and differentiating appropriately.

We recognise that children with SEN and disabilities are at higher risk of peer group isolation and may suffer a disproportionate impact from bullying and we provide proactive support to ameliorate these risks.

We recognise that children with SEN and disabilities may be especially vulnerable to abuse and that there can be additional barriers that exist when recognising abuse or neglect. These can include:

- Assumptions that indicators of possible abuse such as behavior, mood and injury relate to the child's disability without further exploration.
- Being more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Curriculum *(Read in conjunction with Curriculum and RSE / PSHEE policies and RSE / PSHEE scheme of work.)*

At Finton House, there exists a safe, respectful and trusting environment and all children should feel free to discuss any concerns or worries. There are systems in place for children to express their views and give feedback e.g. surveys, Pupils' Council, Pastoral Page on Frog VLE. Emphasis is placed on the willingness of staff to listen to the children. The children are encouraged to talk to staff and their wishes or feelings are taken into account when determining what action to take and what support to provide.

We integrate opportunities into the curriculum for children to develop the skills they need to recognise and stay safe from abuse, allowing continuity and progression throughout key stages. We ensure the curriculum includes input about safe relationships and personal resilience.

The children are taught about safeguarding, including online safety, through computing lessons. This is differentiated according to age and understanding of the peer group or individual. They also as a class discuss safeguarding and any points raised are further discussed at Pupils' Council meetings. As a result, children's wishes and feelings are taken into account when determining how to improve safeguarding in the School or in implementing new systems and processes.

Assemblies and PSHEE lessons are used to develop understanding as to what is and what is not appropriate behaviour, how to speak up regarding their concerns, developing non-abusive behaviour between pupils and strategies of self-protection. Assemblies regularly include topics covering general advice like not talking to strangers, being honest with staff, not bottling things up, bullying and the Finton Goals. The NSPCC 'Speak out, Stay Safe' and 'PANTS' assemblies are delivered to all the children and specific RSE / safeguarding workshops are delivered to Year 5

and 6. In Year 6 & Year 5 there are mentoring groups led by members of staff providing the children with the opportunity to discuss their worries and topics such as online safety.

PSHEE lessons focus on the right to self-protection and aim to equip the children with the skills they need to help them stay safe. For example, in Year 2, they learn how to deal with strangers and in Year 3, there is a discussion about how our bodies are very special and what to do if someone is hurting or touching them in a way, they do not like. There are also regular class circle time activities and drama lessons to explore issues such as personal safety and keeping safe.

From September 2020 Relationship Education (for all primary pupils) and Health Education (for all state-funded schools) was made compulsory. Independent primary schools are required to teach elements of the sex education contained in the Science curriculum (Year 5 & Year 6). SRE objectives are on the plans and overviews for the Science and PSHEE scheme of works. The elementary aspects of RSE have been included as part of the PSHEE schemes of work throughout the School. (See RSE / PSHEE and Science Schemes of Work for more details and the '*Sex and Relationship Education policy*').

The following resources are shared with staff to help support and teach about safeguarding, as preventive education:

- DfE advice for schools: teaching online safety in schools
- UK Council for Internet Safety (UKCIS)37 guidance: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people
- The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: Thinkuknow
- Public Health England: Every Mind Matters
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

## Recruitment, Selection, Disclosures and Disqualification

*(For details read Recruitment, Selection & Disclosures Policy.)*

We have an explicitly written a Recruitment, Selection & Disclosures Policy that reflects both national and local guidance and safer recruitment. Child Protection and Safeguarding questions are always asked at interview and one member of the interview team has had safer recruitment training.

EduCare Safer Recruitment online training completed:

The Head (June 2022)  
 DSL (March 2022)  
 Deputy Head Academic (April 2022)  
 Bursar (Sept 2022)  
 Chair of Governors (Feb 2022)  
 Operations and HR Coordinator (Jan 2022)  
 Head's PA (Nov 2021)

All training is updated every five years via Educare online training.

At interview, candidates will be asked to account for any gaps in their employment history. All staff and peripatetic teachers have an enhanced DBS with a children's barred list information check. Please refer to policy for details.

If children are being supervised on a site other than the School, for example during a school trip, Finton House member of staff always supervises the children and parents are never left with a group of children. The best assurance is gained that the staff of the other organisation have been checked for suitability.

### Disclosure of Circumstances affecting Staff suitability to work with children

In addition, staff are required to notify the School immediately if there are any reasons why they should not be working with children. Staff must immediately disclose to the Head:

- Any circumstances in which they are cautioned for, convicted of or charged with a criminal offence.
- Any circumstances affecting their suitability to work with children.
- Any medical conditions or medication that may affect their suitability to work with children and/or the safety of children/or staff generally.

A failure of a member of staff to make such a disclosure may be considered a disciplinary matter and could lead to dismissal. If they are unsure whether a particular circumstance affects their suitability to work with children, they must seek guidance from the Head.

### Childcare Disqualification

The Childcare (Disqualification) Regulations 2009 ("the Regulations") provide that a person who is disqualified under the Regulations may not provide relevant childcare or be directly involved in the management of such provision.

The DfE require all persons involved in the care and the education of children to provide relevant information about themselves with regard to their suitability to work with children. In order to comply with the requirement, Finton House School ensures all staff and Governors complete and sign, and periodically review, a declaration of 'Childcare Disqualification' form. A record of this is kept on the 'single, central register and the completed form is placed in their staff file.

Finton House School would not knowingly employ, or engage people, in the School, if they are 'Disqualified'. Disqualification occurs as soon as the above criteria are met, for example, as soon as a caution or conviction occurs, even before the person is formally included on the children's barred list. DfE has advised that relevant convictions are not considered 'spent' in this connection. The grounds for disqualification are not only that a person is barred from working with children (included on the children's barred list) but also include:

- They have been cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad. (*Refer to regulation four, Schedules 2, and 3 of the Regulations.*)
- Other orders have been made against them relation to their care of children. (*Referred to in regulation 4 and listed at Schedule 1 of the Regulations.*)
- They have had their registration cancelled in relation to childcare or children's homes or have been disqualified from private fostering. (*Specified in Schedule 1 of the Regulations.*)

- They have been found to have committed an offence overseas, which would constitute an offence regarding disqualification under the Regulations if it had been committed in any part of the UK.

Staff who fall within the 'disqualification' rule may apply to Ofsted for a waiver of disqualification but such staff may not be used unless and until such waiver is confirmed.

If a member of staff's circumstances change, they must inform the Head immediately of any circumstance that may influence their suitability to work with children in accordance with the Regulations. Any failure to disclose such information may be treated as a disciplinary matter in accordance with the School's Disciplinary Procedure. If a member of staff is unsure if they are covered by the Regulations or whether disclosure is required, they must seek guidance from the Head.

## Technology Policy Including Online Safety

*(It is essential you read the Technology policy including online Safety, Staff AUP, Anti-bullying policy section on cyberbullying and the section on Radicalisation (Prevent) in this policy and Sexting in Appendix 2.)*

The use of technology has become a significant component of many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. E.g. child sexual exploitation, radicalisation and sexual predation. Technology can often provide the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism or radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users; for example child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving or explicit images. For example, consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If our pupils or staff were at risk we would report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The school carries out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks that children face. Online safety is also formally reviewed at the start of each term with the IT Technician, Head and DSL team and whenever it is necessary to do so.

All new members of staff and governors sign an Acceptable Use Agreement (AUA) prior to accessing the School's technology. No staff and visitors including those working with EYFS children are allowed to use personal mobiles, iPads, cameras, for recording or taking photos of children etc. Personal devices are only allowed to be used in an office, staffroom or out of sight of the children. Parents are only allowed to use personal devices to take photos or to film a performance for their own personal use. All of the children have either signed (Upper School) or had shared (Lower School) with them the Acceptable Use Agreement, which includes remote



learning/online home working. All Lower School parents sign electronically to say they have discussed the agreement with their children. All AUAs were last reviewed, revised and signed Sept 2022.

All parents are sent a 'The Images Policy' when their child joins and they have to electronically sign a parents' permission slip saying they have read the policy as well as sign up to whether they want their child to have their child's photo for internal, external or social media use. Parent communications (e.g. introductory evenings, Frog Parent dashboard updates and weekly newsletters) are used to reinforce the importance of children being safe online (when away from school) and parents and carers are informed about the IT system at school that is used to filter and monitor online use.

As a rule, children are not allowed to use mobile phones in school. However, the school recognises they are a very useful tool in life and especially when walking home unaccompanied, if used sensibly. Only Year 6 children may bring a mobile phone to school as long as it is switched off and handed into the office at the beginning of the day for safe-keeping and collected when leaving at the end of the School day. The parents are required to complete a 'Year 6 Travelling to and from School' form.

### Uncollected Children

*(See also Uncollected Children policy.)*

Any uncollected pupils should be taken to Owls located in the library (after dismissal or after a club). Parents have 15 minutes grace after dismissal (i.e.: 4.15 pm) and clubs (i.e.: 5.15 pm) before they are charged. Parents have been advised to come to the next half hourly collection point and the child will be dismissed to the parent by Finton staff. Children with termly booking are registered on Engage, any ad hoc attendance is recorded and held on file for the School Administrator. After Owls finishes (5.30pm), the club leader should phone the parents of any uncollected child. If the parents cannot be contacted the duty member of SLT / DSL is informed, one of the Child's emergency contacts is called, and they are asked to collect the child. If the DSL is not in school inform them by using the following mobile number 07931 995 964 or the Head on 07795 491615.

If all the above fails, then either the DSL, Head or the Deputy DSL will telephone MASH - 020 8871 6622 or Out of hours: 020 8871 6000 and any serious child protection concerns will be passed to the MASH team immediately. The call will be confirmed in writing within 24 hours using the MARF (Multi-Agency Referral Form (See earlier section on 'School Procedure for Suspected Child Abuse' for referrals to Wandsworth Children's Social Care. Children's Social Care will give advice and may carry out appropriate checks and make further attempts to contact the parent. If an appropriate relative or carer is located, they will be asked to ensure that the child is collected from school.

If attempts to contact the parent or appropriate carer are unsuccessful, Children's Social Care will arrange for the child to be collected and taken to a place of safety e.g. a temporary foster carer or family center. A letter will be left at the family home informing the parents of any plans made for the safe care of the child in their absence. They will notify the School of the child's placement and provide contact details as appropriate.

Plans for transporting the child will depend on local arrangements, which would take into account staff availability of hours, the need for adequate insurance cover, appropriate gender balance, and any information about special needs or behavioural difficulties etc. provided by the School. Where possible, two adults will be present. The School and Children's Social Care will mutually agree transport and escort arrangements. Children's Social Care for the School area will liaise with Children's Social Care for the area in which the child resides, if this is different.

If the nature of the incident is considered serious, the arrangements for collecting and caring for the children, including overnight placements, will form part of the Local Authority's emergency plan.

## Whistleblowing Policy

*(Please read the Whistleblowing Policy for details on procedure.)*

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/> Staff can call: 0800 028 0285 - line is available from 8:00 am to 8:00 pm, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Other Policies

This policy has clear links to other policies in our school not outlined above, in particular:

- Anti-bullying
- Pastoral Care
- Missing Child (during the School day)
- Supervision of Pupils (*See Section B of Staff Handbook*)
- Equality Policy (*See also Equality section in Employment Handbook*)
- Inclusion
- Health & Safety
- First Aid and Medication
- Registration
- Drugs
- Clubs (staff and parent policies)
- Educational Visits
- Staff Dress Code (*See Employment Handbook*)
- Staff Behaviours (*See Employment Handbook*)
- Low Level Concerns Policy

Each of these policies is concerned with the safeguarding and protection of all the children in the School from various kinds of harm.

## Appendix 1 – Reporting a Child Protection/Safeguarding Concern via CPOMS



### A Referral to Designated Safeguarding Lead for Child Protection/Safeguarding Concerns reporting via CPOMS

Finton House uses CPOMS to record, track and monitor safeguarding concerns. If you become aware of Safeguarding concerns this must be reported and recorded, in accordance with government guidance and the child protection policy.

All child protection concerns MUST be raised in person in addition to recording them.

Allegations against staff should be made directly to the Head and using CONFIDE for a low level concern.

The DSL will monitor child concerns and report where appropriate to Children's Social Care if a child is deemed at risk of significant harm. This information will be disclosed only to those staff who need to know for the purposes of child protection.

How to record a safeguarding concern:

1. Log onto CPOMS from Finton House dashboard
2. To add a new incident to the system click on the 'Add Incident' link at the top of your screen.
3. This will take you to the incident page where you can proceed to fill in all the required information.
4. Select the child to whom you want to add the incident by beginning to type the name in the student box at the top of the page. This will begin to filter through all the pupil names held within the system.
- 5 Once you have selected a name, the box will turn grey.
6. Fill in the incident text box with all of the details about the incident which you are adding. This is a free text box so you can add as much or as little as needed. Be careful to be accurate and specific.

Consider the following:

- Write the incident as a statement of events, not as an email or letter addressed to anyone
- Include any actions you have taken or will take, e.g call home or speak to the student if appropriate
- Don't direct staff members to take any specific actions- these will be recorded and actioned by the DSL/Deputy DSL.

7. After you have filled in all of the details of the incident you need to select at least one category to assign it to (if there is an overlap you can select more than one). The DSL and Deputy can re-categorise incidents if needed.
8. You can then choose to link in other students if more than one is involved in a particular incident. This will copy the incident to all pupils selected. You can also click to monitor the linked student under the same category, if necessary, and also share any documents attached to the incident.
9. The 'Body map' feature allows you to apply numbered markers to a body map image to support your incident text. Describe the marks in the text box indicating which number on the body map the mark refers to.
10. Following this you can select a time and date. These will both default to the current time and date you are adding the incident, however if you wish to change it to when the incident actually occurred you can do so here.
11. Next, you can choose which members of staff you wish to alert. Begin typing a name and CPOMS will filter through all CPOMS registered staff members. Alert DSL / Head to all incidents.
12. If you would like to attach a document to support the incident e.g. a social services letter, previous school case notes, or meeting minutes etc. you can do so at this point. Simply click to

browse and find the relevant document on your pc and add as you would an email attachment, or drag a file from one of your folders to upload.

13. Next, you can add any agency names to the incident to make others aware of which agencies are involved with this pupil.

14. Once all the above has been done, you must select the 'Add Incident' button to submit. This will then send out email alerts to all of the selected staff members telling them that they need to log in to CPOMS to look at a newly added incident.

## Appendix 2 – Definitions and Recognising Abuse

### Definition of Child Protection:

*The process of protecting individual children identified as either suffering, or at risk of suffering, significant harm as a result of abuse or neglect.*

The Children Act 1989 (Section 31) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

### Definition of Child Abuse:

*A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. (KCSiE 2022)*

Child abuse is taken to refer to any child less than 18 years. Abuse is broadly divided into four categories: - Neglect, Physical Injury, Sexual Abuse and Emotional Abuse. These categories do overlap and an abused child frequently suffers more than one type of abuse. Further advice can be found on the NSPCC website - [www.nspcc.org.uk](http://www.nspcc.org.uk), or email [help@nspcc.org](mailto:help@nspcc.org) or telephone 0808 800 5000.

## Physical Abuse

### Definition of Physical Abuse:

*Physical abuse is a form of abuse, which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (KCSiE - Sept 2022)*

Physical abuse can happen to any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens.

Some of the following signs may be indicators of physical abuse:

- Unexplained injuries e.g. eye injuries, cuts, split lips, swollen pelvis, hair pulled out etc., any injuries not consistent with the explanation given for them or several different explanations provided for an injury.
- Bruising in the following areas: around the mouth, two simultaneous bruised eyes, multiple bruising to the head or face, outlines of objects such as hair brush, belt marks etc., bruising or tears around the earlobe/s indicating injury by pulling or twisting, bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.
- Bite marks - these leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.
- Burns or scalds - it is difficult to distinguish between accidental and non-accidental. Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods, iron or electrical fire elements and burns of uniform depth over a large area.
- Fractures may cause pain, swelling and discolouration over a bone or joint.
- Scars of different sizes or ages on different parts of the body may suggest abuse.
- The parents or carers are uninterested or undisturbed by an accident or injury.
- Family use of different doctors and A & E departments.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury).
- Injuries that occur to the body in places that are not normally exposed to falls and rough games.
- Injuries that have not received medical attention.
- Instances where children are kept away from the group or school inappropriately.
- Reluctance to change for, or participate in, games or swimming.
- Refusal to discuss injuries.
- Fear of medical help.
- Self-destructive tendencies.
- Aggression towards others.
- Changes or regression in mood or behaviour particularly where a child withdraws or becomes clinging.

## Emotional Abuse

### Definition of Emotional Abuse:

*Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmental inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child although it may occur alone. (KCSiE 2022).*

- The effects of emotional abuse might take a long time to be recognisable. It may be in the way a parent interacts with their child. Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. Emotional abuse may involve serious bullying – including cyberbullying through social networks, online games or mobile phones by a child's peers.

Some of the following signs may be indicators of emotional abuse:

Emotional abuse may be difficult to recognise because the signs are usually behavioural rather than physical. The indicators of emotional abuse are often also associated with other forms of abuse. Professionals should be aware that emotional abuse might also signify the presence of other kinds of abuse.

- Developmental delay
- Children who are excessively withdrawn, fearful, or anxious about doing something wrong.
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder'.
- Parents or carers blaming their problems on their child, and who humiliate their child, for example, by name-calling or making negative comparisons.
- Over-reaction to mistakes
- Continual self-deprecation
- Appeasing behaviour towards others
- Withdrawn or seen as a 'loner' – difficulty relating to others.
- Sudden speech disorders
- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging and finds it difficult to relate to others.
- Nervousness, frozen watchfulness.
- Sudden under-achievement, lack of concentration, low self-esteem or lack of confidence.
- Inappropriate relationships with peers and/or adults.
- Aggressive behaviour towards others.
- Neurotic behaviour (for example rocking, hair twisting, excessive thumb sucking).
- Self-mutilation.
- Attention seeking behaviour.
- Running away/stealing/lying.
- Fear of parents being contacted.
- Persistent tiredness

## Sexual Abuse and Exploitation

In Wandsworth referrals are made to MASH who work with Evolve and Multi Agency Risk



Vulnerability Exploitation team (MARVE).

## Definition of Sexual Abuse:

*Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (KCSiE 2022)*

Many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health.

Some of the following signs may be indicators of sexual abuse:

Recognising sexual abuse can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional and behavioural. Boys and girls of any age may be sexually abused and are often scared to say anything due to fear and/or guilt. It is particularly difficult for a child to talk about their sexual abuse. Disclosure can often initially be indirect as the child tests the professional's response.

- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in sexual play or conversation inappropriate to his/her age group.
- Self-harm (including eating disorders), self-mutilation or suicide attempts.
- Pain or itching of genital area or blood on underclothes.
- Physical symptoms such as injuries to the genital or anal area; bruising to buttocks, abdomen and thighs; sexually transmitted disease; presence of semen on vagina, anus, external genitalia or clothing.
- Bloodstains on underwear.
- Sexual activity through words, play, drawing or inappropriate masturbation.
- Child who is sexually provocative or seductive with adults.
- Extreme shyness about changing in front of peers or adults for swimming or games.
- Parents may ask staff not to undress or change their child.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations.
- Behaviour indicative of excess adult responsibilities at home - for example a girl who takes over the mothering role/wifely responsibilities, whether or not the mother lives there.

## Definition of Sexting (Source: UKCCIS 2016)

*The production and/or sharing of sexual photos and videos of and by young people who are under the age of 18'. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth-produced sexual imager'.*

'Sexting' does not include the sharing of sexual photos and videos of under-18s with or by adults. This is a form of child sexual abuse and must be referred to the police.

What to do if an incident involving 'sexting' comes to your attention:

- Report it to your Designated Safeguarding Lead (DSL) immediately.
- Never view, download or share the imagery yourself, or ask a child to share or download. This is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL. If the image on an electronic device such as iPad or mobile phone, if possible, switch the device to airport mode, make sure pin protected and shut down device. Do not delete the image, send it to anyone or save it anywhere.
- Do not ask the child/children who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident to other members of staff or the child/children it involves. Contact with parents needs to be agreed with the DSL and, possibly, the police or social care professionals.
- Do not say or do anything to blame or shame any of the children involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

*See the School's Anti-bullying policy.*

## Sexual Violence

Definitions for Sexual Violence:

*(Source: Sexual Offences Act 2003 & DfE publication, 'Sexual violence and sexual harassment between children in schools and colleges' updated Sept 2021 - <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>)*

### Rape

A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

### Assault by Penetration

A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

### Sexual Assault

A person (A) commits an offence of sexual assault if she/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

### Sexual Harassment

## Definition for Sexual Harassment:

'Unwanted conduct of a sexual nature' that can occur online and offline (context of child on child sexual harassment). Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

## Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12<sup>th</sup> April 2019. '*Upskirting*' typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Anyone of any gender, can be a victim. (KCSiE 2022)

## Sexual Exploitation

### Definition of Sexual Exploitation (CSE):

(Please see Child Criminal Exploitation (CCE) and 'County Lines' in 'Different Safeguarding Issues' )

*Child sexual exploitation is a form of sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.*

*CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. (KCSiE 2022)*

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Like all forms of child sex abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex.
- Can still be abuse even if the sexual activity appears consensual.
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- Can take place in person or via technology, or a combination of both.
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

- May occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be, the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual or criminal:

- Appear with unexplained gifts or new possessions.
- Associate with other children involved in exploitation.
- Suffer from changes in emotional well-being.
- Misuse drugs or alcohol.
- Go missing for periods of time or regularly come home late.
- Regularly miss school or education or do not take part in education.
- Have older boyfriends or girlfriends (indicator for CSE).
- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant (indicator for CSE).

For more information see - *Child sexual exploitation: definition and guide for practitioners* (Feb 2017) - <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

## Neglect

### Definition of Neglect:

*Neglect is the persistent failure to meet child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. (KCSIE 2022)*

Children who are neglected often also suffer from other types of abuse. Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritizing buying drugs, or alcohol, over food, clothing or warmth of the child. Neglect may occur during pregnancy because of maternal drug or alcohol abuse. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Some of the following signs may be indicators of neglect:

- Evidence of neglect is built up over a period and can cover different aspects of parenting.
- Provide adequate food and clothing
- Children who are living in a home that is indisputably dirty or unsafe.

- Poor personal hygiene and health care
- Provide shelter including exclusion from home and abandonment.
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence.
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause.
- Children who are often angry, aggressive or self-harm.
- Emaciation
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child feeling unloved and insecure.
- Child thrives away from home environment.
- Frequent lateness or non-attendance at school
- Parents who fail to seek medical treatment when their children are ill or are injured.
- Destructive tendencies
- Low self-esteem
- Poor social relationships
- Running away
- Child left with inappropriate carers e.g. too young or complete strangers.
- Child left alone with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods.

*NOTE: It is important that not all the above signs be taken as indicating that abuse has definitely taken place, but that the possibility should be considered far more than in the past. Such signs should make us stop and think - not jump to conclusions inappropriately*

## Appendix 3 – Different Safeguarding Issues

If there are any concerns about any of the below, talk to the DSL:

### Bullying including cyberbullying and sexting

This can seriously cause psychological, emotional, behavioural, and physical repercussions that can stem from victimisation. [www.kidscape.org.uk](http://www.kidscape.org.uk) or [www.childnet.com](http://www.childnet.com). See *Anti-bullying policy and Appendix 2 for sexting*.

### Child abduction and community safety incidents

Police-recorded offences of abduction have double in just five years in England and Wales (1,000 cases in 2020).

*Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers. (KCSiE 2022)*

Community safety incidents near the School would raise concerns such as someone loitering nearby or unknown adults engaging children in conversation.

Lessons focus on building children's confidence and abilities and not simply warning them about strangers. For example children walking home on their own i.e. Year 6. Year 6 are provided with practical advice on how to keep safe through workshops to prepare them for secondary transfer. Useful resources: <http://www.actionagainstabduction.org/> & <https://clevernevergoes.org/>

### Child Criminal Exploitation

*(Please see Child Sexual Exploitation (CSE) in 'Definitions and Recognising Abuse' and 'County Lines' below.)*

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (this is similar to CSE).

- In exchange for something the victim needs or wants, and/or
- For the financial or other advantage of the perpetrator(s) or facilitator and/or
- Through violence or the threat for violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced or manipulated into transporting drugs or money through county lines, (see *County Lines* below for more details), working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims should be recognised. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of



criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education or do not take part in education.

## Child Sexual Exploitation (CSE)

(See Appendix 2)

## Child pornography and the Internet

If a member of staff or a carer is discovered to have placed child pornography on the Internet or accessed child pornography, the police must be informed.

## Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes, they have witnessed. The below is a link to a guide to support children 5-11 year olds - <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

We carefully monitor children whose parents are separating or divorcing and are aware that child arrangements via the family courts following the separation can be stressful and entrench conflict in families. This document has clear and concise information on the dispute resolution service for parents - <https://helpwithchildarrangements.service.justice.gov.uk/>

## Children who run away or go missing

These children are particularly vulnerable and may be at significant risk at times. (See section in main policy for more details.)

## Children with family members in prison

Approximately 200,000 children have a parent in England and Wales sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Nicco provides information to support children - <https://www.nicco.org.uk/>.

## County Lines

(Please see Child Sexual Exploitation (CSE) in '*Definitions and Recognising Abuse*' and *Child Criminal Exploitation* above.)

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. (KCSiE 2022)

Children can be targeted and recruited into county lines in a number of locations including schools. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing and are subsequently found in areas away from their home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office - *Criminal exploitation of children and vulnerable adults: county lines* - <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

County Lines Toolkit For Professionals - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). (*KCSiE 2022*)

Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or to change grades awarded.
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL will refer to the Cyber Choices programme. Additional advice can be found at:

Cyber Choices - <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

NPCC- 'When to call the Police' -  
<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

National Cyber Security Centre - <https://www.ncsc.gov.uk/>

## Disabled/Special Educational Needs children

A disabled or SEN Child is as vulnerable to physical, emotional or sexual abuse or neglect as any other child is, though the level of risk may be higher. (See section on *Children with Special Educational Needs and Disabilities* under 'Other Policies' in the policy and 'Special Educational Needs' Policy).

## Domestic Abuse

*Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. (KCSiE 2022)*

It kills more women than cancer or road accidents. In the UK in 2017, out of 2.0 million DVA victims, 1.2 million were women. In addition 536 000 were victims of sexual assaults. (Source: Lord Justice Munby Oct 2017)

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children are affected by domestic abuse in a variety of ways that may impair their ability to concentrate on work and how they interact socially. They are often:

- Traumatized by what they see
- Preoccupied with worry about their mother when they are not with her.
- May intervene to stop an assault and get hurt.
- Copy the behavior
- Develop stress-related illnesses
- Lose confidence
- Become afraid and angry or blame themselves for the incidents.
- Children will often feel torn, unsure whether to do or say anything or struggle with the secrecy of what is happening within their family.

The School has signed up to an agreement with Wandsworth Borough schools with regard to Operation Encompass, which is an information sharing agreement between the Metropolitan Police and Wandsworth Borough Schools. If the police have responded to a domestic incident and there are children in the family, the officers working on Operation Encompass will disclose details of the incident with the child's school by 12 noon (Monday to Friday). At each school, the information is shared securely with the Designated Safeguarding Lead, and is treated as sensitive and confidential. The actual content of the information shared is kept to a minimum, i.e. outlining the offence, but without specific details. The information is also shared with the MASH who triage the incident and if it meets threshold Level 3 or 4 there will be a Section 47 or Children & Family Assessment. If not the MASH 'step it down' to Early Help or support services. The MASH should update the School within 24 hours on receiving the alert and if they have referred the case to Early Help they will contact the School within 2 days (there might be a delay if the MASH initially conducted an assessment before 'stepping it down').

The DSL will assess the level of need and will not need to make a referral to MASH as they already have the information unless the School has additional information regarding disclosures and domestic abuse which has not been reported to the police. If the child has a social worker the DSL will contact them and not assume they have the information.

Research shows that children who are involved or who have witnessed domestic abuse are more at risk of emotional harm and potentially physical harm. The information is shared in order to ensure the safety and wellbeing of the child, and so that support can be offered to the child and their family if necessary.

Operation Encompass teachers' helpline is available for all staff in education settings and allows staff to speak in confidence with an educational psychologist about how best to support children experiencing domestic abuse. Phone: 0204 513 9990 Opening hours: Monday to Friday, term-time, 8am to 1pm. [https://www.operationencompass.org/school-participation/resources-for-teachers?utm\\_source=14%20January%202020%20C19&utm\\_medium=Daily%20Email%20C19&utm\\_campaign=DfE%20C19](https://www.operationencompass.org/school-participation/resources-for-teachers?utm_source=14%20January%202020%20C19&utm_medium=Daily%20Email%20C19&utm_campaign=DfE%20C19)

The Government document 'Domestic abuse: How to get help' outlines signs of emotional, physical and sexual abuse, how to report it and where to get help from. <https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>

The National Domestic Abuse helpline is run by Refuge and offers free, confidential support 24 hours a day to victims and those who are worried about friends and family.

<https://www.nationaldahelpline.org.uk/> Tel: 0808 2000 247

<http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>

The NSPCC - <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>

SafeLives - <https://safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

The men's advice line Respect: <https://mensadviceline.org.uk/> Tel: 0808 801 0327

## Fabricated or induced illness

*Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.* - NHS

FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to himself or herself).

Behaviours in FII include a mother or other carer who:

- Persuades healthcare professionals that their child is ill when they're perfectly healthy.
- Exaggerates or lies about their child's symptoms.
- Manipulates test results to suggest the presence of illness - for example, by putting glucose in urine samples to suggest the child has diabetes.
- Deliberately induces symptoms of illness - for example, by poisoning her child with unnecessary medication or other substance.

## Faith or belief abuse

This is child abuse linked to faith or belief. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts)

and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number, which is believed by some to allow malevolent spirits to enter the home. For more details, see DfE - *National action plan to tackle child abuse linked to faith or belief* - <https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

### Female Genital Mutilation (FGM) (*see also So-called 'Honour based' Abuse*)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practice FGM. It should be noted that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a specific statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Reports should be made via a non-emergency number 101. Those staff failing to report such cases will face disciplinary sanctions.

It will be rare for staff to see visual evidence, and they should not be examining pupils. All teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out and unless the member of staff has a good reason not to, they should discuss the case with the DSL (or deputies) and they will involve Children's Social Care by contacting the MASH. The duty does not apply in relation to at risk or suspected cases (i.e. where the member of staff does not discover that an act of FGM appears to have been carried out, through disclosure either by the victim or by visual evidence). In these instances, DSL would advise the MASH of the concern. For more details, see *Wandsworth FGM guidance 2016* and DfE *Multi agency statutory guidance on Female Genital Mutilation* - <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

### Forced marriage (*see also So-called 'Honour-based' Abuse*)

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one of both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be when a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage. More information and advice can be obtained from Tel: 020 7008 0151 or email: [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk)

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK ([www.gov.uk](http://www.gov.uk))

Foreign exchange visits - children staying with a family selected by the School in the host country are vulnerable.

Gangs and youth violence - for more information please see *Ending gang and youth violence: cross-government report* - <https://www.gov.uk/government/publications/ending-gang-and-youth-violence-cross-government-report>

## Gender-based violence

Gender-based violence is violence directed against a person because of their gender. Both women and men experience gender-based violence but the majority of victims are women and girls (Violence against women and girls -VAWG). Many forms of violence against women are rooted in power inequalities between women and men.

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (or deputies) would make a referral to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. There may also be a referral to Children's Social Care and this will be via MASH in Wandsworth. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behavior, as well as a family being asked to leave a property.

## Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Modern slavery: how to identify and support victims - [www.gov.uk](https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims). (KCSiE 2022)

## Parent prostitution

The involvement of family members in prostitution does not necessarily mean the children will suffer significant harm.

## Parents who misuse drugs or alcohol

Misuse of drugs and/or alcohol is strongly associated with significant harm to a child, especially when combined with other problems, such as domestic violence. This includes the trafficking of drugs.

## Racial, religious harassment

Experience of family racism is likely to affect how a child behaves.

## Relationship abuse

Abuse in relationships can happen to anyone. It is not normal; it is never ok and definitely not part of a healthy relationship. It is not always physical; it can be emotional and sexual abuse too.

## Self-Harm

Self-harm in school-aged children is a very real issue that all schools need to take seriously.

*Self-harming is when someone chooses to inflict pain on themselves or cause themselves harm or injury in some way.* (It is repetitive and can escalate in frequency and severity).

Someone who self-harms is communicating they are in a state of emotional distress. Some children only self-harm once or twice but other do it regularly and find it hard to stop. Boys and girls are both affected, but boys are less likely to tell someone about it.



There are two types of self-harm: physical and emotional, and young people will go to great lengths to hide them or explain them away. There are many reasons why young people may start to self-harm. Some factors most commonly identified include:

- Attempted suicide or self-harm by a family member
- Low self-esteem
- Mental health problems, such as depression
- Family conflict (periods in care, parental separation)
- On-going family relationship problems
- Sexuality, race, culture or religion
- Bereavement
- Family circumstances
- Past or present physical or sexual abuse
- Family models of self-harm
- Bullying (including cyberbullying and homophobic bullying)
- Feeling under intense pressure to succeed / achieve / be perfect.

Some indicators that a child is self-harming or may be at risk of self-harming are:

- Lack of self-esteem / feeling overly negative about themselves
- Depression, tearfulness, low motivation
- Being bullied or bullying others
- Social withdrawal
- Significant change in friendships
- Regularly bandaged wrists / arms
- Obvious burns, cuts or scratches (that do not appear accidental)
- A reluctance to participate in activities which involve changing clothes
- Wearing long sleeves even in hot weather and hats to hide the signs
- Bald patches (hair may have been pulled out)
- Unusual eating habits
- Risky behaviours (e.g. drug taking; alcohol or substance misuse; casual sexual activity)

Experts say self-harm behaviour normally ends within five years of starting. However, for some, it can last into adulthood.

Cyberbullying and other forms of online abuse can drive young people to self-harm, whilst pro-self-harm websites or communities that spread knowledge of self-harming techniques can encourage experimentation.

Any disclosure or other concern about self-harm should be passed to the DSL. Some pupils may choose to confide in another pupil, rather than an adult. A risk assessment and management plan will be drawn up and this may involve a referral to Wandsworth Early Help via an Early Help Assessment form (access to route to CAMHS) or a MARF referral to MASH. There will be on going monitoring and the pupil will be assessed at regular intervals.

## Serious Violence

All staff are aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime.

There are indicators that signal that a child is at risk from, or is involved with serious violent crime. These may include:

- Absence from school
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing

- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions, which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (*See CCE*).
- Involved with individuals associated with criminal networks or gangs.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

So-called **‘Honour Based’** Abuse (HBA) (including Female Genital Mutilation and Forced Marriage)

*So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context Abuse of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. (KCSiE 2022)*

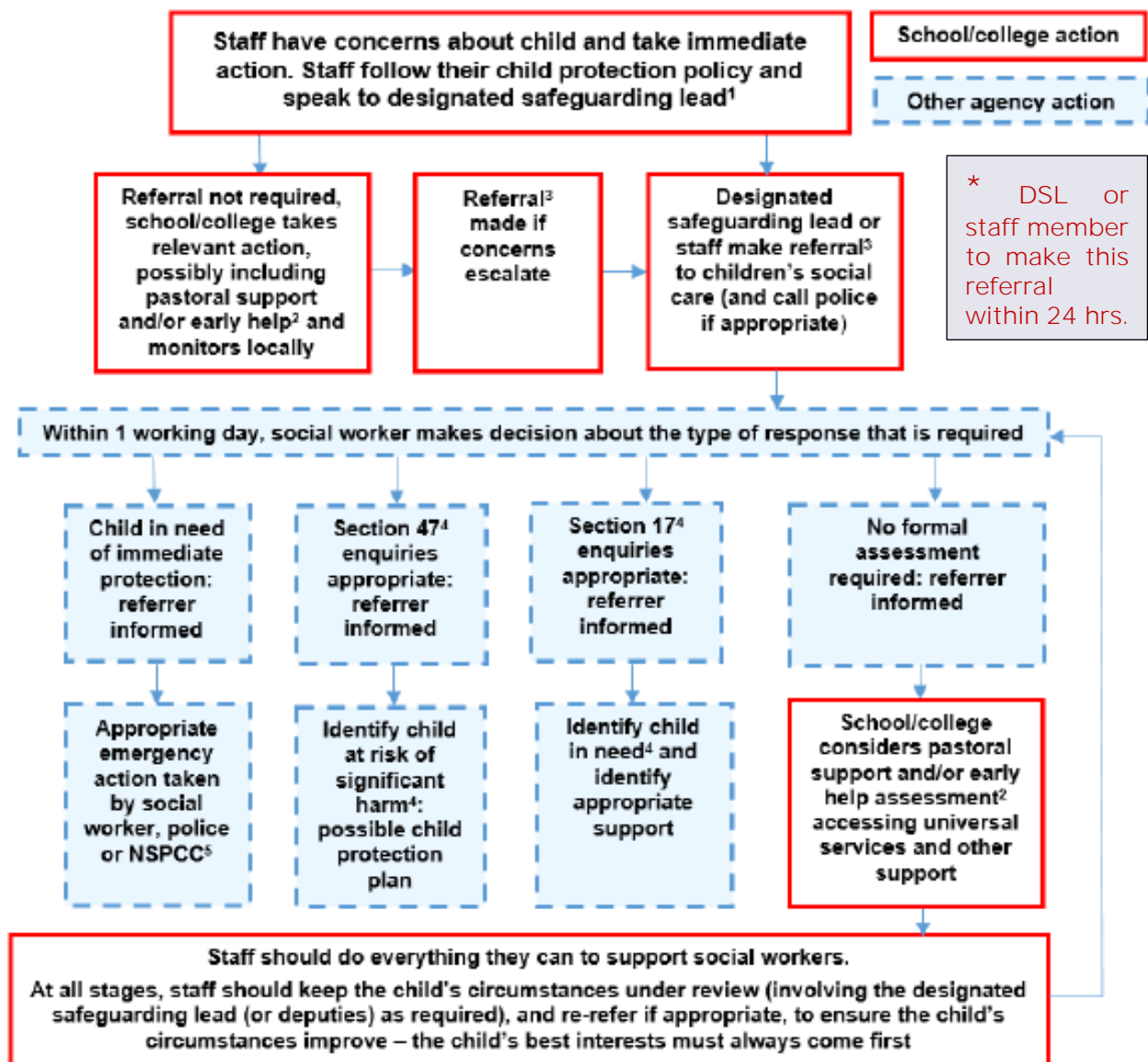
All forms of so-called HBA should be reported to the DSL.

Severe parental mental illness

In some cases, this will seriously affect the safety, health and development of the child.

## Appendix 4 – Actions where there are Concerns about a Child

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Appendix 5 – Summary of Child Protection Protocol for Staff

The designated safeguarding members of staff in our school are:

DSL – Catherine Hitchcock supported by the Head, Ben Freeman

Deputy DSL – Susan Dalton

Deputy DSL EYFS – Lucy Andrews

Deputy Online safety DSL – Andy Dyer Assistant Head Technology

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. It ensures there is no maltreatment of children at all levels and that they grow up in safe environment.

KCSiE states that Safeguarding is:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- in addition, taking action to enable children to have the best outcomes.

Child protection is part of the safeguarding process. It refers to the activities that are undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. It is the welfare activities to protect children from sexual, emotional and physical abuse as well as neglect. Child protection aims to protect children who are suffering or are likely to suffer at the hands of parents or others who are close to them.

All staff and adults in a school have a statutory responsibility to safeguard and promote the welfare of all pupils at all times. If you have a concern about a child or you receive information that leads you to be concerned that a child has been harmed or is at risk of harm or their welfare is being compromised, you are required to act appropriately to ensure action can be taken to protect the child.

The concern may be because of a disclosure from a pupil, a parent or a third party or may arise due to behaviour that has caused you to become concerned.

Safeguarding issues include: (*See policy for more details*)

- Allegations of physical abuse by a parent, other adult/child or sibling- or of witnessing this.
- Allegations of inappropriate physical/sexual contact by a parent, other adult/child or sibling – alternatively, witnessing this.
- Allegations of witnessing inappropriate behaviour by a parent, other adult/child or sibling (such as drug taking, sexual behaviour, crime).
- Allegations of anything, which may cause physical or mental harm to the child.
- A member of staff witnessing marks/bruises which are unusual or severe. The child does not have to be approached as to their origin by the observing member of staff. This should be discussed with the DLS, as it may be more appropriate for them to discuss the matter.
- Concerns regarding the use of technology, electronic communication, social networking etc. (this is also referred to as online safety).
- Anything else, which could be interpreted as putting the physical or mental well-being of the child at risk.

## Procedure Guidance for Staff

Staff should follow this protocol on child protection issues:

### 1. Listen

Listen carefully to what the pupil is telling you without interrupting. You should remember that when speaking to the child, no promises of confidentiality can be made, and care should be taken to listen and record the child's own words, rather than make suggestions or ask leading questions. Remain non-judgmental and keep an open mind.

### 2. Record

After speaking to the child in the case of a disclosure, or after observing something unusual, write down the main points of the disclosure/observation on CPOMS, including the date. This is most important as a clear record will be needed further on. Try to write the account as soon as you can to ensure an accurate and detailed record.

### 3. Inform

Go and talk to the DSL or Deputy DSLs and ensure they are alerted on CPOMS. However, small you may think the incident is the DSL or Deputy DSL may well have further knowledge from other sources that add to the allegation in some way. If you feel the child is in immediate danger, then the DSL or Deputy DSLs should be contacted immediately or you can make a referral direct to Children's Social Care

Please remember the DSL or Deputy DSLs are available to help provide advice and guidance to staff and pupils. If you have a concern or problem and are unclear how to proceed do ask for advice.

### Further points to note

- A child should never be pressured to give information or show staff parts of the body not normally visible when the child is wearing school uniform. Any physical examination of child should be left to a trained Health Care professional.
- In the event of an allegation, being made by a child against a member of staff then the Head must be informed. If the Head is absent or is the person against whom the allegation is made the Chair of Governors or Child Protection Governor must be contacted immediately. They will deal with the matter following Procedures for Dealing with Allegations against Staff. (*For more details see 'KCSiE - 2022 DfE'*)

This is only a brief summary and should be read in conjunction with the Child Protection/Safeguarding Policy

## Appendix 6 – Guidance Documents & Legislation

The Children Act 1989 & 2004

Sexual Offences Act 2003

Serious Crime Act 2015

The Counter-Terrorism and Security Act 2015

Disqualification under the Childcare Act 2006

General Data Protection Act 2018

Education Act 2002, Equality Act 2010 & The Children and Families Act 2014

London Child Protection Procedures - 6th edition (London Safeguarding Children Partnership) updated March 2022 - <https://www.londoncp.co.uk/>

The Education (Independent Schools Standards) Regulations 2014

Managing Allegations Against Staff - [www.wscp.org.uk](http://www.wscp.org.uk)

Children Missing from Home and Care - [www.wscp.org.uk](http://www.wscp.org.uk)

Sexual exploitation - [www.wscp.org.uk](http://www.wscp.org.uk)

Domestic Violence - [www.wscp.org.uk](http://www.wscp.org.uk)

Mental Health and Behaviour in Schools

Teacher misconduct: the prohibition of teachers

Statutory guidance on Children who run away or go missing from home or care

Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children - *DfE updated July 2022*

Prevent Duty Guidance for England and Wales

The Prevent Duty (Departmental advice for schools and childcare providers)

The use of social media for online radicalisation

Information Sharing Guidance; Advice for practitioners providing safeguarding services to children, young people, parents and carers

**What to do if you're worried about a child being abused**

Supporting practice in tackling child sexual abuse - CSA Centre Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.



Inspecting safeguarding in early years, education and skills settings

Children missing in education: statutory guidance for local authorities

Preventing and tackling bullying: Advice to headteachers, staff and governing bodies & Cyberbullying: Advice for headteachers and school staff

Sexual violence and sexual harassment between children in schools and colleges – Revised Sept 2021 - <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Wandsworth Safeguarding Children Partnership – Thresholds for Intervention  
[www.wscp.org.uk](http://www.wscp.org.uk)

Keeping children Safe in Education: Statutory guidance for schools and colleges – DfE 2022. This guidance contains links to guidance and advice about many of the key specific safeguarding issues - <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2> .

*This links to guidance and advice about many of the key specific safeguarding issues.*

[www.gov.uk/government/publications](https://www.gov.uk/government/publications)

## Appendix 7 – Radicalisation Risk Assessment

We consider the risk at Finton House to be low due to the age range of the children, the catchment area and the social-economic demographics of our school group.

Completed by: DSL Team

Date: May 2021

RISK	POTENTIAL HARM	RISK: High, medium, low	PREVENTION	ANY FURTHER ACTION REQUIRED
Radicalisation of parents.	Risk of radicalisation by an extremist organisation, family member or friend.	Likelihood low  Severity high	CT/staff are proactive in noticing any changes in parent behaviour.	To inform DSL and a referral if necessary is made to MASH for children and via Channel for adults i.e. Any concerns over adults can be made to the Wandsworth Community Safety Unit (CSU) Phone: 020 3276 2610, <a href="mailto:Communitysafetyunit-ww@met.police.uk">Communitysafetyunit-ww@met.police.uk</a> . The local police force non-emergency number for advice is 101 and in an emergency use 999 or 112 - Wandsworth Police Station, 146 Wandsworth High Street, London SW18 4JJ - <a href="http://www.content.met.police/UK/Home">www.content.met.police/UK/Home</a> . The CSU details are prominently displayed in the staffroom. CEOP may also be contacted <a href="http://www.ceop.gov.uk">http://www.ceop.gov.uk</a> . Non-emergency advice is available from the DfE dedicated helpline and mailbox for non-emergency advice: 020 7340 7264 and <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>  Safeguarding Governor to be briefed and Chair of Governors and reported in termly report to Governors.
Radicalisation of pupils or staff through on-line grooming, social media, contacts etc.	Risk of online radicalisation e.g. through a terrorist organisations such as ISI seeking to radicalise people with social media and the Internet.	Likelihood low  Severity medium	Filters in place on internet via Smoothwall.	To inform DSL, Head, & IT Technician. They will lead the initial internal investigation and parents of the child will be informed and advised of action.  For staff the Head or Chair of Governors (if incident involves the Head) would consult the LADO and contact Anita Gibbons. LADO, Designated Officer (day to day LADO work) 07974 586461. <a href="mailto:Anita.Gibbons@richmondandwandsworth.gov.uk">Anita.Gibbons@richmondandwandsworth.gov.uk</a>  For pupils a referral would be made to MASH or Early Help depending on the severity. A simultaneous referral may be made to Channel as well.

[illegible]

			<p>Details are in CP/Safeguarding policy and on Staff board in staffroom together with radicalisation disclosures contacts.</p> <p>DSL &amp; Deputy DSLs attend regular meetings with members of Wandsworth CP/Safeguarding department &amp; are up to date with the latest practice, which is then shared with Governors and Staff.</p>	
Vulnerable children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.	Radicalisation of Individual child through social media, internet, family member or friend.	<p>Likelihood low</p> <p>Severity medium</p>	<p>Building resilience to radicalisation through the promoting of British fundamental values and enabling them to challenge extremist views e.g. PSHEE, RE, history lessons and assemblies.</p> <p>Prevent strategy reflected in safeguarding/curriculum policies.</p> <p>Staff receive basic Prevent awareness training to ensure they can identify children at risk of being drawn into terrorism &amp; recognise those that have extremist ideas.</p> <p>Good communication among staff and assimilation of information e.g. safeguarding a weekly agenda item on all staff meetings.</p> <p>Clear referral route for vulnerable children to receive support through the Channel process outlined in Child Protection/Safeguarding policy.</p> <p>Checks on prospective staff /peripatetic specialists and diligence checks conducted on visitors and contractors working in the School. Contractors are supervised at all times.</p> <p>All visitors wear either a green or a red identification badge. Those with a green badge have completed the relevant checks in accordance with the Safer Recruitment Policy and may attend the site without being accompanied at all times by a member of Finton staff. Those with a red badge must be attended by a member of Finton staff at all times. All staff have ID badges and everyone is electronically signed in.</p>	<p>To inform DSL and a referral if necessary may be made to MASH or to Channel.</p> <p>Head/SLT &amp; Safeguarding Governor to be briefed. To also be reported in termly safeguarding report to the Governor Safeguarding and Wellbeing Committee.</p>

<p>Visiting speaker or educational/SEN/Medical specialist who have extremist views or links with radical organisations. Or which have views that contradict 'Fundamental British Values' of individual liberty and mutual respect and tolerance for those of different beliefs and faiths.</p>	<p>Radicalisation of staff or pupils.</p>	<p>Likelihood low</p> <p>Severity medium</p>	<p>All SEN Specialists/therapists working with children have to bring into school their DBS certificate together with ID.</p> <p>All visiting speakers, in-house educational visitors have to bring in a copy of a DBS form or photo ID. The office carries out a risk assessment prior to their arrival. They are never left unattended by staff.</p> <p>Any visiting speaker or specialist not working with children 1:1 is never left unescorted and wears the relevant school visitors badge colour, which is red and are electronically signed in.</p> <p>Staff are aware of the above procedure. Before any such visitors comes into school, the School Office completes a risk assessment form. Any concerns are shared with the DSL or Deputy DSL.</p>	<p>Each Friday Deputy DSL meets with School Secretary to check that all visitors for following week have been entered onto the radicalisation assessment record.</p>
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## Appendix 8 – Useful Wandsworth Contacts

Ameliah Rayan	0208 871 7961 office
	07929 862210 Work mobile
	<a href="mailto:Ameliah.Rayn@richmondandwandsworth.gov.uk">Ameliah.Rayn@richmondandwandsworth.gov.uk</a>
Education Safeguarding Lead	07775 417475 Work mobile
	07931 325 665 mobile
MASH (Multi-Agency Safeguarding Hub)	
MASH Manager	020 8871 6622 Out of hours: 020 8871 6000
	<a href="mailto:MASH@wandsworth.gov.uk">MASH @wandsworth.gov.uk</a>
Ruth Lacey, Head of Safeguarding Standards	
	<a href="mailto:ruth.lacey@richmondandwandsworth.gov.uk">ruth.lacey@richmondandwandsworth.gov.uk</a>
Early Help	
Assistant Director Rachel Egan:	<a href="mailto:rachel.regan@richmondandwandsworth.gov.uk">rachel.regan@richmondandwandsworth.gov.uk</a>
EHITS Team	020 8871 7746
Early Help Front Door	020 8871 6622
Tooting Early Help Cluster: Nicky Nicholls (Head of Tooting Cluster) & Geraldine Lorage (Team Manager)	020 8871 5559/62222
Principal Administrator Jackie Reynolds	020 8871 7208
Looked After Children	
Nova Levine (Headteacher Wandsworth Virtual School)	020 8871 7351
Mobile – 07557 295630	<a href="mailto:nova.levine@richmondandwandsworth.gov.uk">nova.levine@richmondandwandsworth.gov.uk</a>
Prevent & Hate Crime Coordinator	
Shamila Majid	<a href="mailto:Shamila.Majid@richmondandwandsworth.gov.uk">Shamila.Majid@richmondandwandsworth.gov.uk</a> Mobile: 07974586486
<b>WSCP (Wandsworth Safeguarding Children's Partnership)</b>	
Development manager	020 8871 8610
<b>Wandsworth Safeguarding Children's Partnership</b>	020 8871 7401
	<a href="http://www.wscp.org.uk">www.wscp.org.uk</a>
LADO	
Designated Officer (day to day LADO work)	07974 586461
Wandsworth safety net	0207 801 1777
<i>(For Independent Domestic Abuse advisors)</i>	



Wandsworth Community Safety Unit (CSU), Robyn Thomas or Avis Bailey

020 3276 2610

[Communitysafetyunit-ww@met.police.uk](mailto:Communitysafetyunit-ww@met.police.uk)

[Thomas@richmondandwandsworth.gov.uk](mailto:Thomas@richmondandwandsworth.gov.uk) or [Bailey@richmondandwandsworth.gov.uk](mailto:Bailey@richmondandwandsworth.gov.uk)

Wandsworth Police Station, 146 Wandsworth High Street, London SW18 4JJ

[www.content.met.police/UK/Home](http://www.content.met.police/UK/Home).

Prevent Enquiries

[Prevent@richmondandwandsworth.gov.uk](mailto:Prevent@richmondandwandsworth.gov.uk)

Chair of Channel Panel

[Mark.Wolski@richmondandwandsworth.gov.uk](mailto:Mark.Wolski@richmondandwandsworth.gov.uk)

Non-emergency advice is available from the DfE dedicated helpline and mailbox for non-emergency advice. 020 7340 7264

[counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

Local Police for non-emergency advice

101

Police Emergency

999 or 112

Private Fostering

Specialist Private Fostering Senior Social Worker (Beatrice Ogunbowale) 020 8871 6471

[Beatrice.ogunbowale@richmondandwandsworth.gov.uk](mailto:Beatrice.ogunbowale@richmondandwandsworth.gov.uk)